

From: [Integrity.gov](https://integrity.gov)
To: [Fugh, Justina](#)
Subject: Integrity.gov: Report Pending Action
Date: Tuesday, October 17, 2017 4:42:48 PM

A 2017 Annual report for Copper, Carolyn is pending your action as Certifying Official. You may access the report by logging into Integrity at <https://integrity.gov>.

From: [Integrity.gov](https://integrity.gov)
To: [Fugh, Justina](#)
Subject: Integrity.gov: Report Pending Action
Date: Wednesday, March 21, 2018 10:47:46 AM

A 2017 Annual/Termination report for Copper, Carolyn is pending your action as Certifying Official. You may access the report by logging into Integrity at <https://integrity.gov>.

From: [Copper, Carolyn](#)
To: [Fugh, Justina](#)
Cc: (b) (6)
Subject: Re: Clarification Needed on Termination Reporting Period
Date: Friday, December 8, 2017 5:08:56 AM

Got it. Thanks Justina!

On Dec 7, 2017, at 10:42 PM, Fugh, Justina <Fugh.Justina@epa.gov> wrote:

Hi Carolyn,

Gosh, I'm sorry, but I got seriously busy over the last couple of days and failed to respond to you earlier! Because you are filing a termination report, the reporting period for you is 1/1/17 through 12/7/17. But we will accept your report early, so it can be as of the date you file the report (so, basically, CY 2017 up to the date you file).

Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Copper, Carolyn

Sent: Wednesday, December 06, 2017 10:59 AM

To: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: Clarification Needed on Termination Reporting Period

Hi Justina – Could you help pinpoint me on the date range I should be using for my 278 termination report? My last day is this Friday, Dec 8. I can guess at the date range using the chart below from Integrity, but I gather precision is better than a guess in these matters. Thanks much for your help.

~Carolyn

Reporting Period

The type of public financial disclosure report being filed will determine which Parts a filer must complete and the applicable reporting periods covered by those Parts.

Part	New Entrant and Nominee	Annual	Termination	Annual / Termination
1	Preceding Two Calendar Years to Filing Date	Preceding Calendar Year to Filing Date	End of Period Covered by Last Report to Term Date	Preceding Calendar Year to Term Date
2	Preceding Calendar Year to Filing Date	Preceding Calendar Year	End of Period Covered by Last Report to Term Date	Preceding Calendar Year to Term Date

3	As of Filing Date	Preceding Calendar Year to Filing Date	End of Period Covered by Last Report to Term Date	Preceding Calendar Year to Term Date
4	Preceding Two Calendar Years to Filing Date	N/A	N/A	N/A
5	Preceding Calendar Year to Filing Date	Preceding Calendar Year	End of Period Covered by Last Report to Term Date	Preceding Calendar Year to Term Date
6	Preceding Calendar Year to Filing Date	Preceding Calendar Year	End of Period Covered by Last Report to Term Date	Preceding Calendar Year to Term Date
7	N/A	Preceding Calendar Year	End of Period Covered by Last Report to Term Date	Preceding Calendar Year to Term Date
8	Preceding Calendar Year to Filing Date	Preceding Calendar Year	End of Period Covered by Last Report to Term Date	Preceding Calendar Year to Term Date
9	N/A	Preceding Calendar Year	End of Period Covered by Last Report to Term Date	Preceding Calendar Year to Term Date

Carolyn Copper, PhD
 Assistant Inspector General for Program Evaluation
 Office of Inspector General
 United States Environmental Protection Agency
 Washington, DC
 202-566-0829
copper.carolyn@epa.gov

From: [Carolyn Copper](#)
To: [Fugh, Justina](#)
Cc: (b) (6)
Subject: [SPAM-Sender] RE: Extension Request on Termination 278
Date: Wednesday, December 20, 2017 11:32:28 AM

Thanks Justina. Happy Holidays!

On Dec 18, 2017 11:57 PM, "Fugh, Justina" <Fugh.Justina@epa.gov> wrote:

Hi Carolyn,

Sorry, but I was on travel most of last week. I could give you 45-day extension that puts your due date at February 22 or give you 90 additional days that puts your due date at 4/9/18. I went with 90 days but good for you if you get it in earlier than 4/9.

Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Carolyn Copper [mailto:(b) (6)]
Sent: Friday, December 15, 2017 10:10 AM
To: Fugh, Justina <Fugh.Justina@epa.gov>; ethics <ethics@epa.gov>
Subject: FW: Extension Request on Termination 278

Good Morning – I'm checking back on my request for an extension to Feb 28, 2018. Do you have feedback for me on this extension request?

Thanks ~ Carolyn

From: Carolyn Copper [mailto:(b) (6)]
Sent: Tuesday, December 12, 2017 10:47 AM
To: 'fugh.justina@epa.gov' <fugh.justina@epa.gov>
Cc: (b) (6)
Subject: Extension Request on Termination 278

Hi Justina -- I'm requesting an extension until February 28, 2018 to file my termination report. The termination report is currently due Jan 8, 2018. It's not possible for us to calculate income/gains on the majority of our assets because the numbers aren't generated until the end of the tax year. We rely on the end of calendar year tax reports and annual summaries from (b) (6) for our gain/loss and dividend determinations. Please let me know of any questions or if the extension can be approved.

Thanks very much ~ Carolyn

From: [Copper, Carolyn](#)
To: [Fugh, Justina](#)
Cc: [Ross, Margaret](#)
Subject: RE: Need to Schedule Post-employment Ethics Briefing
Date: Wednesday, November 29, 2017 2:55:38 PM
Attachments: [image002.jpg](#)
[image004.jpg](#)
[image007.jpg](#)
[image009.jpg](#)

Good to know Thanks

From: Fugh, Justina
Sent: Wednesday, November 29, 2017 2:53 PM
To: Copper, Carolyn <Copper.Carolyn@epa.gov>
Cc: Ross, Margaret <Ross.Margaret@epa.gov>
Subject: RE: Need to Schedule Post-employment Ethics Briefing

Hi Carolyn,

It's actually is a typo and should be \$56,916. We'll make a note of that and correct it when we can. Thanks!

What happened is that, on November 2, 2015, President Obama signed into law the Federal Civil Penalties Inflation Adjustment Act Improvement Act (a terrible name). Basically, it requires that federal agencies make inflationary adjustments to civil monetary penalties. The statutory penalty was \$50,000, but adjusted for inflation, it's now \$56,916.

Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North William Jefferson Clinton Federal Building | Washington DC 20460 (for ground deliveries use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Copper, Carolyn
Sent: Wednesday, November 29, 2017 2:19 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: FW: Need to Schedule Post-employment Ethics Briefing

Hi Justina – I reviewed the on-line training and just wanted to make you aware that there ***might*** be a typo on the page I copied below. Scroll down and see the number highlighted. I say “***might***” because I also thought this could be some of the ethics training humor we’ve all come to know and love!

Leaving Federal Service (Revised 2017)

I. Introduction

II. “Before You Leave”

III. After You Leave

IV. Contacts

You Must File A Termination OGE-278 Report

You must file a termination OGE-278 form (Public Financial Disclosure Form) with OGC/Ethics within 30 days after leaving the EPA. The report must be filed through [INTEGRITY](#), the online public financial disclosure system created and maintained by the Office of Government Ethics unless otherwise instructed by the Agency's [Designated Agency Ethics Official \(DAEO\)](#) or [Alternate Designated Agency Ethics Official \(ADAEQ\)](#).

The EPA's [DAEO or ADAEQ](#) may permit you to file your termination report up to 15 calendar days before your termination date, provided you agree to update it in the event that there are changes to reportable information before or on their termination dates.

If you don't file on time, you can be assessed a \$200 late filing fee. If you don't think you will be able to make the deadline, you must ask OGC/Ethics for an extension **BEFORE** your deadline expires. As per OGE's Legal Advisory [LA 16-04](#), The maximum extension is 90 days. Failure to file a termination OGE-278 is punishable by a fine of up to **\$56,9160**.

When filling out your termination report, remember to include your termination date and use your current EPA phone number and address. However, do give OGC/Ethics your contact information (phone number, email and address) should we need to contact you in the future. You can send contact information to our [email box](#).

Back	Next

From: Copper, Carolyn
Sent: Wednesday, November 29, 2017 5:55 AM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Re: Need to Schedule Post-employment Ethics Briefing
Thanks Justina Talk with you Thursday

On Nov 28, 2017, at 7:26 PM, Fugh, Justina <Fugh.Justina@epa.gov> wrote:

Gosh! Congratulations, Carolyn! I proposed Thursday from 11 to 11:30, and we can do this by phone if you'd like. It should not take 30 minutes, as I just have to find out if you have any post EPA plans and remind you that you have to do one more 278 (the termination report).

Talk to you soon!

Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North William Jefferson Clinton Federal Building | Washington DC 20460 (for ground deliveries use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Copper, Carolyn

Sent: Monday, November 27, 2017 10:34 AM

To: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: Need to Schedule Post-employment Ethics Briefing

Good Morning Justina – I m retiring Dec 8 and wanted to schedule my post-employment ethics briefing Except for Dec 1, when I m out of the office, my schedule is generally open the next 2 weeks

Thanks ~ Carolyn

Carolyn Copper, PhD

Assistant Inspector General for Program Evaluation

Office of Inspector General

United States Environmental Protection Agency

Washington, DC

202-566-0829

copper.carolyn@epa.gov

<Departing EPA for career SES updated Sept 2017 docx>

Fort, Daniel

From: Copper, Carolyn
Sent: Sunday, July 24, 2016 8:43 AM
To: Fort, Daniel
Subject: Re: Cautionary note on holdings

Received. Thanks Dan

Sent from my iPhone

On Jul 21, 2016, at 10:11 AM, Fort, Daniel <Fort.Daniel@epa.gov> wrote:

Dear Carolyn:

In reviewing your OGE-278 (Public Financial Disclosure Report) in INTEGRITY, we noticed that you reported owning certain interests that might be affected by the performance of your official duties. These assets appear to be over the regulatory thresholds, so we are sending you this cautionary letter to remind you to take appropriate steps to ensure that you do not have a conflict of interest. We are not concluding that you currently have a conflict of interest; rather, you should read the information below and contact an ethics official if you have any questions. Remember, it is your obligation to ensure to that your private interests (including your assets) do not conflict with your public duties. Be vigilant!

Why Do We Raise Concerns?

A criminal statute, 18 U.S.C. §208(a), bars you from participating in any “particular matter” that affects any of your own interests or any imputed interest (e.g., spouse or dependent children). Your interests include not only ownership interests (e.g., stock, bonds, mutual funds) but also the interests of outside entities (e.g., any organization in which you are serving as an officer, director, or trustee) and prospective employers (any entity with which you are seeking future employment). So you can’t participate in any particular matter that will have a direct and predictable effect on your financial interest.

The important point to remember here is that 18 U.S.C. §208(a) is a criminal statute. A knowing violation of this statute can result in criminal prosecution and penalties. It’s important to understand the elements of the financial conflict of interest statute. You have to participate “personally and substantially” in a “particular matter” in order for there to be a conflict of interest, and there has to be a “direct and predictable” effect on your financial interests.

What is a particular matter?

A “particular matter” involves any deliberation, decision or action and that is focused on the interests of specific persons/organizations or any identifiable class of persons. It includes “specific party” matters (e.g., contracts, grants, assistance agreements, lawsuits, enforcement action, permits, licenses, audits) and matters of “general applicability” (e.g., rulemaking or policy matters) that distinctively affect a particular industry or identifiable class of persons.

What is “personal and substantial” participation?

Personal participation means that you were personally involved in the matter or that you directed or controlled a subordinate’s participation. *Substantial participation* means that your involvement in the

matter was of significance, which includes decision-making, review or recommendation as to an action being taken, signing or approving a final document, and/or participating in a final decision briefing.

What is a “direct and predictable” effect on a financial interest?

The effect must be direct and predictable and not speculative (though the actual dollar amount does not need to be ascertained). There must be close causal link between any decision or action to be taken in the matter and any expected effect of the matter on the financial interest.

YOUR FINANCIAL INTEREST(S) OF CONCERN

We identified the following financial interest(s) that may be affected by the performance of your official duties and that exceed the regulatory exemption levels. This does not necessarily mean that you have a current conflict of interest, but we want to flag the asset(s) for you:

(b) (6), (b) (3) (A)

Regulatory Exemption Levels

There are different regulatory exemption levels, depending on the type of particular matter. You can still participate if you own less than the levels below:

SPECIFIC PARTY MATTER e.g., an enforcement action against ABC Widget Company	MATTER OF GENERAL APPLICABILITY e.g., working on a rulemaking that affects all widget manufacturers
≤\$15,000 aggregate in ABC Widget Co.	≤\$25,000 aggregate in any one widget maker (e.g., ABC Widget Corp. or DEF Widget Corp.)
≤\$25,000 aggregate for any affected non-parties (e.g., DEF Widget Corp. which manufactures a similar product)	≤\$50,000 aggregate in all affected parties (all widget makers)

Don’t forget that you have to add together your own ownership interest and any imputed interest. You also have to aggregate how many assets you own in the same sector.

EXAMPLE: You own \$8,000 worth of ABC Widget and your spouse also owns \$8,000. You cannot direct your staff to participate in an event at ABC Widget offices because you own more than \$15,000 in the company and cannot participate in any particular matter that involves or affects ABC Widget as a specific party.

EXAMPLE: Your father-in-law passed away recently and bequeathed to your spouse shares in an oil and gas company worth \$30,000. You can’t work on a specific party matter involving that company and also now can’t work on any rulemaking that affects all oil and gas companies.

What to do if you’re worried about a conflict

If you are concerned that you have a conflict, contact OGC/Ethics immediately. We will go over the available options for you. Typically, potential conflict of interests are resolved in one of the following ways:

- 1) Don't participate. This means that you do not participate in the matter at all, including attending meetings, receiving briefings or being copied on substantive documents. We recommend that you document your recusal in writing, with a copy to OGC/Ethics.
- 2) Divest entirely or get below the regulatory threshold. You can either sell outright on your own or, if the sale will result in a tax liability for capital gains, then you may instead contact OGC/Ethics for a "Certificate of Divestiture" before you sell. This will enable you to defer capital gains tax, but you have to ask OGC/Ethics for assistance before you divest.
- 3) Ask for a waiver. Only the Agency's Designated Agency Ethics Official (DAEO) in OGC is authorized to waive the prohibition of 18 U.S.C. §208(a) where the interest is "not so substantial as to be deemed likely to affect the integrity of services which the Government may expect." OGC must consult with another federal agency before issuing a waiver, which are rarely granted.

* * * * *

If you need more information or advice, feel free to contact OGC/Ethics at ethics@epa.gov or any of us individually (Daniel Fort, Justina Fugh, Jeanne Duross, Jennie Keith). Any of us or your regional ethics counselor will be happy to assist you.

Fort, Daniel

From: Fort, Daniel
Sent: Thursday, July 21, 2016 10:12 AM
To: Copper, Carolyn
Subject: Cautionary note on holdings

Dear Carolyn:

In reviewing your OGE-278 (Public Financial Disclosure Report) in INTEGRITY, we noticed that you reported owning certain interests that might be affected by the performance of your official duties. These assets appear to be over the regulatory thresholds, so we are sending you this cautionary letter to remind you to take appropriate steps to ensure that you do not have a conflict of interest. We are not concluding that you currently have a conflict of interest; rather, you should read the information below and contact an ethics official if you have any questions. Remember, it is your obligation to ensure that your private interests (including your assets) do not conflict with your public duties. Be vigilant!

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YOUR FINANCIAL INTEREST(S) OF CONCERN

We identified the following financial interest(s) that may be affected by the performance of your official duties and that exceed the regulatory exemption levels. This does not necessarily mean that you have a current conflict of interest, but we want to flag the asset(s) for you:

(b) (6), (b) (7) (D)

[REDACTED]

Regulatory Exemption Levels

There are different regulatory exemption levels, depending on the type of particular matter. You can still participate if you own less than the levels below:

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Don't forget that you have to add together your own ownership interest and any imputed interest. You also have to aggregate how many assets you own in the same sector.

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* * * * *

If you need more information or advice, feel free to contact OGC/Ethics at ethics@epa.gov or any of us individually (Daniel Fort, Justina Fugh, Jeanne Duross, Jennie Keith). Any of us or your regional ethics counselor will be happy to assist you.

Message

From: Integrity.gov [notifications@integrity.gov]
Sent: 7/23/2016 4:52:30 PM
To: Fort, Daniel [Fort.Daniel@epa.gov]
Subject: Integrity.gov: Report Pending Action

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From: Fort, Daniel [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F2BB4D69D03D4139ADA09111B3F80B7F-DFORT]
Sent: 7/21/2016 2:11:35 PM
To: Copper, Carolyn [Copper.Carolyn@epa.gov]
Subject: Cautionary note on holdings

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-
-
-
- Ex. 6 Personal Privacy (PP)
-
-
-

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* * * * *

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Message

From: Fort, Daniel [Fort.Daniel@epa.gov]
Sent: 1/27/2016 4:03:34 PM
To: Copper, Carolyn [Copper.Carolyn@epa.gov]
Subject: Thanks...good advice

Yeah, by the end of the storm I had 28" of snow in my yard. I have a long driveway (84 feet) and it was a real pain to keep it clear. My snow blower is only good up to 8 inches at a time, so I had to make four different passes including three on Saturday at 1AM, 7AM, 5 PM and final one on Sunday morning at 8AM.

Thanks for the feedback. FYI, OGE is going to make a few more changes to the system in response to agency comments in order to make INTEGRITY easier for filers. More on that when the changes become final.

From: Copper, Carolyn
Sent: Wednesday, January 27, 2016 10:25 AM
To: Fort, Daniel
Subject: RE: You did great on your OGE-278T in INTEGRITY...one question.

Hi Dan. It was pretty easy. I do have a delegate (that process was smooth as well), but I completed this one. The only advice I can offer is follow the directions and just take it slow the first time – just like any new thing! Hope you're faring well with the weather!

~Carolyn

Carolyn Copper, PhD
Assistant Inspector General
Office of Program Evaluation
Office of the Inspector General
US Environmental Protection Agency
Washington, DC
202-566-0829
copper.carolyn@epa.gov

From: Fort, Daniel
Sent: Tuesday, January 19, 2016 3:31 PM
To: Copper, Carolyn
Subject: You did great on your OGE-278T in INTEGRITY...one question.

Just wanted to get your feedback on your INTEGRITY experience. How easy was it? Did you delegate it to someone else? Got any good advice I can pass on?

Thanks.

Dan

Message

From: Fort, Daniel [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F2BB4D69D03D4139ADA09111B3F80B7F-DFORT]
Sent: 1/13/2016 8:50:49 PM
To: Copper, Carolyn [Copper.Carolyn@epa.gov]
Subject: Some information on INTEGRITY that might be of interest to you
Attachments: IntegrityAddFilerDesignee.pdf

Since you have quite a number of transactions that you file on OGE-278Ts, I thought that you would like to know that you don't have to wait for us to assign you an OGE-278T form. You can start one anytime. We have already assigned you an annual OGE-278e report through the INTEGRITY system.

For your final OGE-278T periodic financial disclosure report of 2015 (i.e., transactions that took place in December, 2015), we've given filers the option of either using the paper form one last time or use INTEGRITY to file the form. If you use INTEGRITY, this means you will be able to upload the OGE-278T for December into your annual report for 2016 (covering calendar year 2015) that is due on May 16 of this year. Your choice! We are fine either way. For any transactions in 2016, you'll have to file the OGE-278T in INTEGRITY

I'm not sure if this is applicable for you, but the new Office of Government Ethics (OGE) financial disclosure system (INTEGRITY) allows filers to designate others (including non-federal employees) to fill out financial disclosure reports. In this way, you can have an outside party fill out both the annual OGE-278e and the periodic financial disclosure form OGE-278T on your behalf. However, you'll still have to sign them electronically and submit them online to OGC/Ethics through INTEGRITY. If you are interested, I have attached the designation instructions. Also, see: <http://intranet.epa.gov/ogc/Integrity/IntegrityAddFilerDesignee.pdf>. FYI, we also set up [an internal intranet site](#) for EPA filers that has other valuable information on filling out financial disclosure forms including a comparison of the old OGE-278 form to the new OGE-278e form (the same information is collected, but in a different format).

Since this is a new system, any feedback you can give me on how well the system worked for you will be greatly appreciated. I can then provide this feedback to the Office of Government Ethics.

Let me know if there's anything else I can do to help.

Dan

How to Add a Filer Designee: Filer

INTEGRITY.gov
Play your part

Adding a Designee Walkthrough

1. After logging into Integrity.gov, look at your “My Tools” section.
2. Click on “Manage My Designees.”
3. This opens a “My Designees” page. Click “Add a New Designee.”
4. Add your designee’s information into the system.
5. Click “Save Designee.”
6. Integrity confirms the addition of your designee on the next screen.
7. Your designee will receive an email with login instructions.
8. On the “My Designees” screen, you may add another designee or remove any designees you added previously.

NOTE: Your designee can see all the information you can see in Integrity until you remove the designee using the “Manage My Designees” tool.

Message

From: Copper, Carolyn [Copper.Carolyn@epa.gov]
Sent: 7/24/2016 12:44:34 PM
To: Fort, Daniel [Fort.Daniel@epa.gov]
Subject: Fwd: Integrity.gov: Report Returned

Hi Dan - the requested amendments have been made and the 278 resubmitted.
Thanks - Carolyn

Sent from my iPhone

Begin forwarded message:

From: Integrity.gov <notifications@integrity.gov>
Date: July 21, 2016 at 10:12:10 AM EDT
To: <Copper.Carolyn@epa.gov>
Subject: **Integrity.gov: Report Returned**
Reply-To: Integrity.gov Notification <notifications@integrity.gov>

Daniel Fort has requested that you amend your 2016 Annual Report filed 5/14/2016. Access the report by logging into Integrity at <https://integrity.gov>.

To view comments/requests for additional information, scroll through your report to find the entries that have a check mark beside them. Click on the "+" button to open the dialogue box below that entry to see the information you need to provide. After you have completed making your changes, be sure to hit the "submit" button at the end of the report! Otherwise, your changes will be not be sent back to us.

If you have any questions concerning filling out the report, send a note to ethics@epa.gov and we will respond as soon as we can. You should hear from us within two business days after you send the email.

For additional guidance about filling out the OGE-278 annual and OGE-278-T periodic financial disclosure form, see: <https://www2.oge.gov/Web/278eGuide.nsf>

Message

From: Copper, Carolyn [Copper.Carolyn@epa.gov]
Sent: 5/13/2016 7:03:48 PM
To: Fort, Daniel [Fort.Daniel@epa.gov]
Subject: Re: Question on 278e

Thanks Dan. It would be great if you can pass word on to the developers about a mass moving feature. Enjoy your weekend!

Sent from my iPhone

On May 12, 2016, at 11:55 AM, Fort, Daniel <Fort.Daniel@epa.gov> wrote:

Carolyn!

Hi! To answer your question, you can only move one asset at a time from one section to another. However, since I do occasionally have opportunities to speak with the developers of the system in the Office of Government Ethics (OGE), I'll let them know that would be a good feature to have.

In the meantime, we really don't care where you put the assets, as long as they are there. Actually, OGE itself really doesn't care unless you are a nominee for a PAS position and your form has to go before the US Senate.

So, if it looks like it's going to be too much trouble to move the assets, you can leave them where they are. How easy is that?

Dan

<ecblank.gif> <ecblank.gif>
From: Carolyn Copper/OIG/USEPA/US
<ecblank.gif> <ecblank.gif>
To: Ethics,
<ecblank.gif> <ecblank.gif>
Date: 05/12/2016 08:33 AM
<ecblank.gif> <ecblank.gif>
Subject: Question on 278e

Hello All – I need to move a large block of assets from one section of my (pending) 278e to another. There's a 'move asset' feature in 278e, but, from what I've seen in the system, it only allows movement of a single asset (or entry) at a time. Are you aware of any feature in 278e that allows moving multiple assets (i.e., 'blocks') from one section to another? If there's someone else I should direct my question to you, please advise.

Thanks in advance!

~Carolyn

Carolyn Copper, PhD

Assistant Inspector General for Program Evaluation

Office of Inspector General

United States Environmental Protection Agency

Washington, DC

202-566-0829

copper.carolyn@epa.gov

Message

From: Copper, Carolyn [Copper.Carolyn@epa.gov]
Sent: 7/24/2016 12:42:45 PM
To: Fort, Daniel [Fort.Daniel@epa.gov]
Subject: Re: Cautionary note on holdings

Received. Thanks Dan

Sent from my iPhone

On Jul 21, 2016, at 10:11 AM, Fort, Daniel <Fort.Daniel@epa.gov> wrote:

Dear Carolyn:

In reviewing your OGE-278 (Public Financial Disclosure Report) in INTEGRITY, we noticed that you reported owning certain interests that might be affected by the performance of your official duties. These assets appear to be over the regulatory thresholds, so we are sending you this cautionary letter to remind you to take appropriate steps to ensure that you do not have a conflict of interest. We are not concluding that you currently have a conflict of interest; rather, you should read the information below and contact an ethics official if you have any questions. Remember, it is your obligation to ensure that your private interests (including your assets) do not conflict with your public duties. Be vigilant!

Why Do We Raise Concerns?

A criminal statute, 18 U.S.C. §208(a), bars you from participating in any “particular matter” that affects any of your own interests or any imputed interest (e.g., spouse or dependent children). Your interests include not only ownership interests (e.g., stock, bonds, mutual funds) but also the interests of outside entities (e.g., any organization in which you are serving as an officer, director, or trustee) and prospective employers (any entity with which you are seeking future employment). So you can’t participate in any particular matter that will have a direct and predictable effect on your financial interest.

The important point to remember here is that 18 U.S.C. §208(a) is a criminal statute. A knowing violation of this statute can result in criminal prosecution and penalties. It’s important to understand the elements of the financial conflict of interest statute. You have to participate “personally and substantially” in a “particular matter” in order for there to be a conflict of interest, and there has to be a “direct and predictable” effect on your financial interests.

What is a particular matter?

A “particular matter” involves any deliberation, decision or action and that is focused on the interests of specific persons/organizations or any identifiable class of persons. It includes “specific party” matters (e.g., contracts, grants, assistance agreements, lawsuits, enforcement action, permits, licenses, audits) and matters of “general applicability” (e.g., rulemaking or policy matters) that distinctively affect a particular industry or identifiable class of persons.

What is “personal and substantial” participation?

Personal participation means that you were personally involved in the matter or that you directed or controlled a subordinate’s participation. *Substantial participation* means that your involvement in the matter was of significance, which includes decision-making, review or recommendation as to an action being taken, signing or approving a final document, and/or participating in a final decision briefing.

What is a “direct and predictable” effect on a financial interest?

The effect must be direct and predictable and not speculative (though the actual dollar amount does not need to be ascertained). There must be close causal link between any decision or action to be taken in the matter and any expected effect of the matter on the financial interest.

YOUR FINANCIAL INTEREST(S) OF CONCERN

We identified the following financial interest(s) that may be affected by the performance of your official duties and that exceed the regulatory exemption levels. This does not necessarily mean that you have a current conflict of interest, but we want to flag the asset(s) for you:

- <!--[if !supportLists]--><![endif]-->
- <!--[if !supportLists]--><![endif]-->
- <!--[if !supportLists]--><![endif]-->
- <!--[if !supportLists]--><![endif]--> **Ex. 6 Personal Privacy (PP)**
- <!--[if !supportLists]--><![endif]-->
- <!--[if !supportLists]--><![endif]-->
- <!--[if !supportLists]--><![endif]-->

Regulatory Exemption Levels

There are different regulatory exemption levels, depending on the type of particular matter. You can still participate if you own less than the levels below:

SPECIFIC PARTY MATTER	MATTER OF GENERAL APPLICABILITY
e.g., an enforcement action against ABC Widget Company	e.g., working on a rulemaking that affects all widget manufacturers
≤\$15,000 aggregate in ABC Widget Co.	≤\$25,000 aggregate in any one widget maker (e.g., ABC Widget Corp. or DEF Widget Corp.)
≤\$25,000 aggregate for any affected non-parties (e.g., DEF Widget Corp. which manufactures a similar product)	≤\$50,000 aggregate in all affected parties (all widget makers)

Don’t forget that you have to add together your own ownership interest and any imputed interest. You also have to aggregate how many assets you own in the same sector.

EXAMPLE: You own \$8,000 worth of ABC Widget and your spouse also owns \$8,000. You cannot direct your staff to participate in an event at ABC Widget offices because you own more than \$15,000 in the company and cannot participate in any particular matter that involves or affects ABC Widget as a specific party.

EXAMPLE: Your father-in-law passed away recently and bequeathed to your spouse shares in an oil and gas company worth \$30,000. You can’t work on a specific party matter involving that company and also now can’t work on any rulemaking that affects all oil and gas companies.

What to do if you’re worried about a conflict

If you are concerned that you have a conflict, contact OGC/Ethics immediately. We will go over the available options for you. Typically, potential conflict of interests are resolved in one of the following ways:

- 1) Don't participate. This means that you do not participate in the matter at all, including attending meetings, receiving briefings or being copied on substantive documents. We recommend that you document your recusal in writing, with a copy to OGC/Ethics.
- 2) Divest entirely or get below the regulatory threshold. You can either sell outright on your own or, if the sale will result in a tax liability for capital gains, then you may instead contact OGC/Ethics for a "Certificate of Divestiture" before you sell. This will enable you to defer capital gains tax, but you have to ask OGC/Ethics for assistance before you divest.
- 3) Ask for a waiver. Only the Agency's Designated Agency Ethics Official (DAEO) in OGC is authorized to waive the prohibition of 18 U.S.C. §208(a) where the interest is "not so substantial as to be deemed likely to affect the integrity of services which the Government may expect." OGC must consult with another federal agency before issuing a waiver, which are rarely granted.

* * * * *

If you need more information or advice, feel free to contact OGC/Ethics at ethics@epa.gov or any of us individually (Daniel Fort, Justina Fugh, Jeanne Duross, Jennie Keith). Any of us or your regional ethics counselor will be happy to assist you.

Message

From: Copper, Carolyn [Copper.Carolyn@epa.gov]
Sent: 1/15/2016 1:21:46 PM
To: Fort, Daniel [Fort.Daniel@epa.gov]
Subject: RE: Some information on INTEGRITY that might be of interest to you

Thanks Dan!

From: Fort, Daniel
Sent: Wednesday, January 13, 2016 3:51 PM
To: Copper, Carolyn <Copper.Carolyn@epa.gov>
Subject: Some information on INTEGRITY that might be of interest to you

Since you have quite a number of transactions that you file on OGE-278Ts, I thought that you would like to know that you don't have to wait for us to assign you an OGE-278T form. You can start one anytime. We have already assigned you an annual OGE-278e report through the INTEGRITY system.

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Let me know if there's anything else I can do to help.

Dan

Message

From: Fugh, Justina [Fugh.Justina@epa.gov]
Sent: 5/3/2017 4:06:47 PM
To: Adams, Elizabeth [Adams.Elizabeth@epa.gov]; Allnutt, David [Allnutt.David@epa.gov]; Araujo, Rochelle [Araujo.Rochelle@epa.gov]; Badalamente, Mark [Badalamente.Mark@epa.gov]; Bagley, Mark [Bagley.Mark@epa.gov]; Banister, Beverly [Banister.Beverly@epa.gov]; Barnett, Henry [Barnet.Henry@epa.gov]; Barone, Stan [Barone.Stan@epa.gov]; Behl, Betsy [Behl.Betsy@epa.gov]; Benforado, Jay [Benforado.Jay@epa.gov]; Benjamin-Sirmons, Denise [Benjamin-Sirmons.Denise@epa.gov]; Benton, Donald [benton.donald@epa.gov]; Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]; Best-Wong, Benita [Best-Wong.Benita@epa.gov]; Bloom, David [Bloom.David@epa.gov]; Bonanno, Gale [Bonanno.Gale@epa.gov]; Brincks, Mike [brincks.mike@epa.gov]; Briskin, Jeanne [Briskin.Jeanne@epa.gov]; Buckley, Timothy [Buckley.Timothy@epa.gov]; Buhl, Rick [Buhl.Rick@epa.gov]; Bunker, Byron [bunker.byron@epa.gov]; Burneson, Eric [Burneson.Eric@epa.gov]; Buschmann, Margaret [Buschmann.Margaret@epa.gov]; Cascio, Wayne [Cascio.Wayne@epa.gov]; Charmley, William [charmley.william@epa.gov]; Cherry, Katrina [Cherry.Katrina@epa.gov]; Christensen, Kevin [Christensen.Kevin@epa.gov]; Chu, Ed [Chu.Ed@epa.gov]; Clark, Becki [Clark.Beki@epa.gov]; Cleland-Hamnett, Wendy [Cleland-Hamnett.Wendy@epa.gov]; Coe, Mary [Coe.Mary@epa.gov]; Coglian, Vincent [coglian.vincent@epa.gov]; Coleman, Cheryl [Coleman.Cheryl@epa.gov]; Coleman, Sam [Coleman.Sam@epa.gov]; Conolly, Rory [Conolly.Rory@epa.gov]; Copper, Carolyn [Copper.Carolyn@epa.gov]; Cozad, David [Cozad.David@epa.gov]; Crofton, Kevin [Crofton.Kevin@epa.gov]; Cunningham-HQ, Barbara [Cunningham-HQ.Barbara@epa.gov]; DeLeon, Rafael [DeLeon.Rafael@epa.gov]; Devlin, Betsy [Devlin.Betsy@epa.gov]; Diaz-Sanchez, David [Diaz-Sanchez.David@epa.gov]; Dierker, Carl [Dierker.Carl@epa.gov]; DiPasquale, Nicholas [dipasquale.nicholas@epa.gov]; Dix, David [Dix.David@epa.gov]; Doa, Maria [Doa.Maria@epa.gov]; Dolph, Becky [Dolph.Becky@epa.gov]; Dombrowski, John [Dombrowski.John@epa.gov]; Dorka, Lilian [Dorka.Lilian@epa.gov]; Dunham, Sarah [Dunham.Sarah@epa.gov]; Edlund, Carl [Edlund.Carl@epa.gov]; Edwards, Jonathan [Edwards.Jonathan@epa.gov]; Esher, Diana [Esher.Diana@epa.gov]; Etzel, Ruth [Etzel.Ruth@epa.gov]; Fays, Michael [fays.michael@epa.gov]; Fernandez, Cristina [Fernandez.Cristina@epa.gov]; Filippelli, John [Filippelli.John@epa.gov]; Fine, Steven [fine.steven@epa.gov]; Fisher, Bill [Fisher.William@epa.gov]; Flynn, Mike [Flynn.Mike@epa.gov]; Foley, Gary [Foley.Gary@epa.gov]; Frace, Sheila [Frace.Sheila@epa.gov]; Frithsen, Jeff [Frithsen.Jeff@epa.gov]; Garland, Jay [Garland.Jay@epa.gov]; Gillespie, Andrew [Gillespie.Andrew@epa.gov]; Golightly-Howell, Velveta [Golightly-Howell.Velveta@epa.gov]; Gonzalez, Robin [Gonzalez.Robin@epa.gov]; Goodin, John [Goodin.John@epa.gov]; Gratz, Jeff [Gratz.Jeff@epa.gov]; Gray, Linda [gray.linda@epa.gov]; Grevatt, Peter [Grevatt.Peter@epa.gov]; Grifo, Francesca [Grifo.Francesca@epa.gov]; Grimm, Patrick [Grimm.Patrick@epa.gov]; Guerrero, Carmen [guerrero.carmen@epa.gov]; Guerriero, Margaret [guerriero.margaret@epa.gov]; Guilaran, Yu-Ting [Guilaran.Yu-Ting@epa.gov]; Guiseppi-Elie, Annette [Guiseppi-Elie.Annette@epa.gov]; Gullett, Brian [Gullett.Brian@epa.gov]; Gutierrez, Sally [Gutierrez.Sally@epa.gov]; Hadley, Angela [Hadley.Angela@epa.gov]; Hamlin, Tim [Hamlin.Tim@epa.gov]; Harvey, Reid [Harvey.Reid@epa.gov]; Haugen, David [haugen.david@epa.gov]; Helm, Arron [Helm.Arron@epa.gov]; Henry, Tala [Henry.Tala@epa.gov]; Hestmark, Martin [Hestmark.Martin@epa.gov]; Hill, Franklin [Hill.Franklin@epa.gov]; Hisel-McCoy, Sara [Hisel-McCoy.Sara@epa.gov]; Hitchens, Lynnann [hitchens.lynnann@epa.gov]; Holt, Kay [Holt.Kay@epa.gov]; Hoskinson, Carolyn [Hoskinson.Carolyn@epa.gov]; Hull, George [Hull.George@epa.gov]; Jennings, Robert [Jennings.Robert@epa.gov]; Johnson, Barnes [Johnson.Barnes@epa.gov]; Johnson, Kathleen [Johnson.Kathleen@epa.gov]; Jones, Quentin [Jones.Quentin@epa.gov]; Jordan, Deborah [Jordan.Deborah@epa.gov]; Judson, Richard [Judson.Richard@epa.gov]; Kadeli, Lek [Kadeli.Lek@epa.gov]; Kaplan, Robert [kaplan.robert@epa.gov]; Kavlock, Robert [Kavlock.Robert@epa.gov]; Kenny, Shannon [Kenny.Shannon@epa.gov]; Kenyon, Michael [Kenyon.Michael@epa.gov]; Kling, David [Kling.Dave@epa.gov]; Knudsen, Thomas [Knudsen.Thomas@epa.gov]; Korleski, Christopher [korleski.christopher@epa.gov]; Kreutzer, David [kreutzer.david@epa.gov]; Lape, Jeff [lape.jeff@epa.gov]; LaPosta, Dore [LaPosta.Dore@epa.gov]; Larsen, Alan [Larsen.Alan@epa.gov]; Lattimore, Kraig [lattimore.kraig@epa.gov]; Laureano, Javier [laureano.javier@epa.gov]; Layne, Arnold [Layne.Arnold@epa.gov]; Lee, Charles [Lee.Charles@epa.gov]; Legare, Pamela [Legare.Pamela@epa.gov]; Leopard, Matthew [Leopard.Matthew@epa.gov]; Lloyd, David [Lloyd.DavidR@epa.gov]; Lowit, Anna [Lowit.Anna@epa.gov]; Lueckenhoff, Dominique [Lueckenhoff.Dominique@epa.gov]; Mackey, Cyndy [Mackey.Cyndy@epa.gov]; Manzanilla, Enrique [Manzanilla.Enrique@epa.gov]; Mathur, Rohit [Mathur.Rohit@epa.gov]; Mazakas, Pam [Mazakas.Pam@epa.gov]; McCabe, Catherine [McCabe.Catherine@epa.gov]; McIlwain, Serena [McIlwain.Serena@epa.gov]; McKinney, Robert [mckinney.robert@epa.gov]; McClain, Jennifer [McClain.Jennifer@epa.gov]; McNally, Robert [McNally.Robert@epa.gov]; Melvin, Karen [Melvin.Karen@epa.gov]; Messina, Edward [Messina.Edward@epa.gov]; Michaud, John [Michaud.John@epa.gov]; Miller, Wynne [Miller.Wynne@epa.gov]; Minoli, Kevin [Minoli.Kevin@epa.gov]; Moraff, Kenneth [Moraff.Ken@epa.gov]; Morales,

Oscar [Morales.Oscar@epa.gov]; Morris, Jeff [Morris.Jeff@epa.gov]; Mosby, Jackie [Mosby.Jackie@epa.gov]; Mottley, Tanya [Mottley.Tanya@epa.gov]; Mugdan, Walter [Mugdan.Walter@epa.gov]; Munns, Wayne [Munns.Wayne@epa.gov]; Myrick, Pamela [Myrick.Pamela@epa.gov]; Nagle, Deborah [Nagle.Deborah@epa.gov]; Nelson, Leverett [nelson.leverett@epa.gov]; Nguyen, Duch [Nguyen.DucH@epa.gov]; Nishida, Jane [Nishida.Jane@epa.gov]; Noga, Vaughn [Noga.Vaughn@EPA.GOV]; OBrien, Kathy [Obrien.Kathy@epa.gov]; O'Connor, Darcy [oconnor.darcy@epa.gov]; Opalski, Dan [Opalski.Dan@epa.gov]; Osborne, Howard [Osborne.Howard@epa.gov]; Packard, Elise [Packard.Elise@epa.gov]; Page, Steve [Page.Steve@epa.gov]; Patrick, Kimberly [Patrick.Kimberly@epa.gov]; Payne, James [payne.james@epa.gov]; Peck, Gregory [Peck.Gregory@epa.gov]; Peterson, Jeff [Peterson.Jeff@epa.gov]; Peterson, Mary [Peterson.Mary@epa.gov]; Petrole, Maryann [Petrole.Maryann@epa.gov]; Pirzadeh, Michelle [Pirzadeh.Michelle@epa.gov]; Polk, Denise [Polk.Denise@epa.gov]; Price, PaulS [Price.PaulS@epa.gov]; Radzikowski, Mary Ellen [Radzikowski.Maryellen@epa.gov]; Reeder, John [Reeder.John@epa.gov]; Regli, Stig [Regli.Stig@epa.gov]; Richardson, RobinH [Richardson.RobinH@epa.gov]; Robbins, Chris [Robbins.Chris@epa.gov]; Rogers, John M. [Rogers.John@epa.gov]; Ross, Mary [Ross.Mary@epa.gov]; Rowson, David [Rowson.David@epa.gov]; Sasser, Erika [Sasser.Erika@epa.gov]; Sasseville, Sonya [Sasseville.Sonya@epa.gov]; Sawyers, Andrew [Sawyers.Andrew@epa.gov]; Sayles, Gregory [Sayles.Gregory@epa.gov]; Scaggs, Ben [Scaggs.Ben@epa.gov]; Schaaf, Eric [Schaaf.Eric@epa.gov]; Scheraga, Joel [Scheraga.Joel@epa.gov]; Schmidt, Lorie [Schmidt.Lorie@epa.gov]; Scott, Jeff [Scott.Jeff@epa.gov]; Shah, Imran [Shah.Imran@epa.gov]; Shapiro, Mike [Shapiro.Mike@epa.gov]; Shaw, Betsy [Shaw.Betsy@epa.gov]; Shinkman, Susan [Shinkman.Susan@epa.gov]; Silzer, Stefan [Silzer.Stefan@epa.gov]; Simon, Karl [Simon.Karl@epa.gov]; Simon, Nigel [Simon.Nigel@epa.gov]; Sinks, Tom [Sinks.Tom@epa.gov]; Slimak, Michael [Slimak.Michael@epa.gov]; Smidinger, Betsy [Smidinger.Betsy@epa.gov]; Smith, Walker [Smith.Walker@epa.gov]; Sonich-Mullin, Cynthia [Sonich-Mullin.Cynthia@epa.gov]; Stalcup, Dana [Stalcup.Dana@epa.gov]; Steenbock, John [Steenbock.John@epa.gov]; Stein, Kathie [Stein.Kathie@epa.gov]; Stern, Allyn [Stern.Alyn@epa.gov]; Strauss, Alexis [Strauss.Alexis@epa.gov]; Studlien, Susan [Studlien.Susan@epa.gov]; Tapia, Cecilia [Tapia.Cecilia@epa.gov]; Thomas, Russell [Thomas.Russell@epa.gov]; Thompkins, Anita [Thompkins.Anita@epa.gov]; Torres, Tomas [Torres.Tomas@epa.gov]; Tsirigotis, Peter [Tsirigotis.Peter@epa.gov]; Vandenberg, John [Vandenberg.John@epa.gov]; vanDrunick, Suzanne [vanDrunick.Suzanne@epa.gov]; Vizian, Donna [Vizian.Donna@epa.gov]; Vogel, Dana [Vogel.Dana@epa.gov]; Walker, Mike [Walker.Mike@epa.gov]; Wall, Tom [Wall.Tom@epa.gov]; Walsh, Ed [Walsh.Ed@epa.gov]; Ward, Mary-Beth [Ward.Mary-Beth@epa.gov]; Watkins, Harrell [Watkins.Harrell@epa.gov]; Watkins, Tim [Watkins.Tim@epa.gov]; Weber, Rebecca [Weber.Rebecca@epa.gov]; Wells, Jeffrey [Wells.jeffrey@epa.gov]; Whung, Pai-Yei [Whung.Pai-Yei@epa.gov]; Widawsky, David [Widawsky.David@epa.gov]; Wilkes, Mary [Wilkes.Mary@epa.gov]; Williams, Antony [Williams.Antony@epa.gov]; Wise, Louise [Wise.Louise@epa.gov]; Wood, Robert [Wood.Robert@epa.gov]; Woolford, James [Woolford.James@epa.gov]; Zepp, Richard [Zepp.Richard@epa.gov]; Zobrist, Marcus [Zobrist.Marcus@epa.gov]

CC: Fort, Daniel [Fort.Daniel@epa.gov]
Subject: IT'S PUBLIC FINANCIAL DISCLOSURE FILING TIME!

Yes, it's true, your annual public financial disclosure report is due **MAY 15, 2017**. Remember, you must use INTEGRITY (no more paper filings), and that system has been sending you reminder notifications. Thanks to those of you who have already submitted your forms. We're so happy to report that we have already certified one-third of all of the annual filers! Alas, there are still a lot of you who haven't even started your report, so please pay attention to the reminders below.

FILING DEADLINE

Your report will be due in INTEGRITY no later than midnight on Monday, May 15, 2017. If you need an extension, send a request to ethics@epa.gov BEFORE the deadline and give a specific reason (e.g., workload, travel, need to gather paperwork). Tell us whether you need 45 or 90 additional days. You will get confirmation from OGC/Ethics that your extension has been granted, so if you don't see that, then contact us again.

THE FINANCIAL DISCLOSURE REPORT

You must use INTEGRITY to submit your form if you are an incumbent filer. OGC/Ethics no longer accepts paper forms.

REMINDER: transactions

Many of you did a really good job remembering to report transactions on the 278T. Others of you, though, caused us to shake our heads ruefully. We waived the \$200 late filing fee for not filing the 278T, but you may not always be able to rely on our patience. You must use INTEGRITY to file any 278Ts for transactions! Remember, under the STOCK Act, you are required to report periodic transactions for yourself, your spouse and/or your dependent children every month. If you forgot the requirement, review the [ethics advisory](#) and the updated [chart](#).

Can I see my prior certified 278 report?

Yes! You can view your prior report(s) under the "my tasks" section of your INTEGRITY folder.

Things for EVERYONE to know

You will know through INTEGRITY when you submit your report, and we will correspond with you through that system for any changes. We no longer send you personalized confirmation emails that we've received your report. If you are a fretter, though, then of course you can still ask us. Remember, this is only the second year many of you will be using INTEGRITY, so we expect inevitable growing pains, so take a deep breath and CALL US if you start to feel like throwing things at your computer. Don't forget that penalties can be assessed for failure to file the report or for falsification of information. The civil penalty is \$56,916 (adjusted for inflation) and the criminal penalty is one year in jail (not adjusted for inflation). Once again this year, OGC fully intends to assess the \$200 late filing fee, so please don't be late!

Who has to fill out the 278e form?

You have to fill out this form if you are in any of the following types of positions: Presidential Appointment/Senate confirmed (PAS), non-career SES, career SES, SL or ST, Schedule C, AD, ALJ or Title 42. You also have to fill out the form if you are detailed for more than 60 days into any of these positions. In addition, you have to file a termination report when you leave any of these positions, even if you occupied it on detail. A lot of people forget about the need to file a termination report, so bear in mind that the late filing fee and other penalties apply to the termination 278e too.

What if I need help understanding how to fill out the report?

Let's face it: everyone hates this burden. We in OGC/Ethics will not be defeated by the system and will definitely be following up with you (again and again) about questions, which will only prolong your agony.

Here are some important things to remember when completing your report. Following these reminders will reduce the number of emails you'll get from us):

- Start by clicking YES to upload or update your existing information (from your previous report and/or any 278Ts you already filed in INTEGRITY)
- If you own a mutual fund, give its full name, not just "Vanguard" or "T Rowe Price." If you have a 5 letter trading symbol, that's helpful to add. But give us the name and the symbol, not just the symbol (we'll just have to look it up anyway).
- If you are legally married, you must report the assets of your spouse. For heterosexual couples, that's every state in the union. For same-sex couples, the federal government considers you to be married if your ceremony took place in a state that recognizes such marriages. Doesn't matter if you now live in a state that doesn't recognize such marriages.
- Own life insurance? If it's term life insurance (there's a death benefit if the insured dies during the term of the insurance), then it's NOT reportable! If it's whole or universal life, just report the cash value and type/amount of income. If it's variable life insurance (e.g., you can invest in various subaccounts, usually mutual funds), then report the underlying holdings
- Own your home or a second home? If you don't rent it out, then your home mortgage is NOT reportable (except for PAS employees). If you do rent it out, you'll need to report that income on Schedule A (and any mortgage on Schedule C). PAS employees must report all home mortgages, even if the home is not rented out. Please note: we need the city, state location of the property, but DO NOT list the street address
- Don't report any TSP (Thrift Savings Plan holdings) or any other U.S. Government benefits (e.g., your EPA salary or your spouse's federal salary)
- Own TIAA/CREF funds? You'll need to break those out for us by individual funds (e.g., TIAA Traditional Annuity, CREF Stock)

- Get any income from an outside position? You'll need to give us the exact amount. This is only for YOUR income. You have to report the source of spousal income (if from other than the US government), but you do not report the amount of spousal employment.

Gifts and Travel Reimbursement

Don't forget that gifts and travel reimbursements may need to be reported on the financial disclosure report. You should examine the source of gifts and the reason it was given to you. Here's a synopsis of the gift reporting requirements for you:

Tangible gifts: you have to report gifts received in your personal capacity from a non-relative that exceed \$375. Any individual gift of \$150 or less from that same source may be excluded from the aggregation. Gifts from your significant other (who is by definition not a relative) must be reported, while gifts from your mother do not.

Gifts of travel: you have to report gifts received in your personal capacity from any source that exceed \$375. Any individual gift of \$150 or less from that same source may be excluded from the aggregation. DO NOT report gifts of travel that were accepted by OGC under 31 USC 1353 (using the ethics travel form) or 5 USC 7342 (Foreign Gifts and Decorations Act) if you were on official travel. DO report any gift of travel that was approved under 5 USC 4111 (the Government Employees Training Act) even if you were on official travel.

Gifts of free attendance: you may have to report any gift given because of your official position that fell under the widely attended gathering exception at 5 CFR 2635.204(g)(2). For example, if you attended a reception or other gathering, and the cost of the free attendance exceeded \$375, then you have to report that gift on your financial disclosure report. The reason is that the WAG rule makes clear that the employee who receives such a gift must be on annual leave or an excused absence, so the gift is to the individual employee and not to the Agency. Any individual gift of \$150 or less from that same source may be excluded from the aggregation.

Gifts from, say, VW: Any gifts from a prohibited source (like those VW gift cards for affected diesel cars) may have to be reported if the value exceeds the threshold. For example, I recently heard that other car manufacturers (e.g., Ford and Kia) have given owners similar gifts because of fuel economy mistakes. Those gifts should have been reported (but we really don't plan on going back to correct the already-filed forms).

Are you sure I have to fill out the form?

If you are relatively new to your position, maybe not. If you entered your current position after November 1, 2016 -- and filed a report within 30 days of entering -- then you are NOT required to file this annual report. The reason is that officials who serve in covered positions for 60 days or less in the previous calendar year don't need to file the annual report. We'll catch up with you in May 2018.

However, if you entered your current position before November 1, 2016, then you may have to fill out the OGE-278 again, even if you really think you just finished answering all of OGC/Ethics' questions about your previous form. The requirement to file by May 15, 2017 is triggered by how long you've been in your position, not when you finally finished answering our pesky questions.

Oops, what if I don't think I ever filled out a report when I took my detail, or filled out a termination report when I left? PLEASE CALL me right away so that we can sort out what happened. If you were on detail, but aren't anymore, and didn't file a termination report with OGC/Ethics, then that's why you're receiving this message. I need your termination report so that I can remove you from the list of OGE-278 filers, and I may be able to waive the late filing fee.

Wait, how do I get the 278e form again?

HA! Trick question! The answer is that your report was assigned to you through INTEGRITY, so go look for the email from integrity.gov. If necessary, adjust your spam or clutter features.

What's the reporting period again?

For most of you, this is not the first time you've had to complete the 278. We consider you to be "incumbents" in your positions, and you are required to file annually no later than May 15th this year. For incumbent filers, the reporting period is the preceding calendar year. Please note, though, that for parts on Agreements and Arrangements and Positions Outside the Government, you are required to report on the preceding calendar year up to the filing date, which can be a bit longer than just the preceding calendar year.

Oh, I'll never get it done by May 15th. How do I get an extension?

Just ask, but please do so in writing (email is fine) and provide a reason and tell us whether you need 45 or 90 additional days. Among the acceptable reasons are your travel schedule, heavy workload, or the need for additional time to gather materials. Please note that we can't grant an extension after the deadline has passed, so be sure to ask before the deadline. Send your request to ethics@epa.gov, please.

What if I miss the deadline?

There is a 30-day grace period after the due date for you to file your form. If we receive your form after that 30 day grace period, then your form is considered late and you will be assessed a \$200 late filing fee. Unfortunately, OGC/Ethics once again had to assess the late filing fee last year, so believe me, we know how to collect the money.

Is this the only time of year that I have to file this report?

It depends. If you leave EPA, then you may also have to file a termination report. A lot of people don't realize that they are required to file the termination report, so please make note of this obligation. Even if you were in a position on detail, you still have to file the termination report. We have to assign you a termination report, so please let us know your status.

What's a termination report, and when would I have to file that?

When you leave federal service --or when you leave a detail-- you have to file a termination 278 report no later than 30 days after your departure. You need to report on your holdings up to your last day, so that's why we ask that you don't submit the termination report any earlier than your last day. The reporting period for the termination report is the previous calendar year PLUS the current year up to the date of filing.

I'm planning to retire after May 15th. What do I do?

If you are planning to leave federal service within 90 days after the May 15th, then contact OGC/Ethics for an extension. We'll allow you to file a combined annual/termination report instead of having to file two reports. The reporting period will be the previous calendar year up to the date of filing.

What if I am planning to retire after August 15th, but before the end of 2017?

You will have to file two reports: the annual report now AND a termination report later. Sorry.

Is there any way I can get out of filing a termination report?

Sure! If you leave EPA but go to another federal agency AND that new position also requires you to file a 278, then you will not need to file a termination report. You can download a copy of your last certified report in INTEGRITY so that you can give it to your Designated Agency Ethics Official. Ask that person to contact the Office of Government Ethics to move your INTEGRITY file to your new agency. But if you were on a detail to EPA and leave our 278 position to return to your usual non-SES job at EPA, then you have to file a termination report within 30 days of leaving the detail.

What's a new entrant report? Are there different reporting periods for that?

When you enter a position -- either permanently or on detail for more than 60 days -- that requires a 278e, then you have to file a 278e within 30 days of taking the position. That's the "new entrant" report. You can fill out this report in advance of your first day in the position (unlike the termination report, which cannot be submitted until your last day). OGC/Ethics will assign you the "new entrant" report, which is different from the annual report.

How do I get my form to you?

Through INTEGRITY, of course! No more faxing or scanning or mailing!

Anything Else?

If you have any questions regarding any of your ethical responsibilities or have questions regarding your form, please feel free to contact any of us in OGC/Ethics. Thank you in advance for your attention to these matters!

Cheers,
OGC/Ethics (ethics@epa.gov)

Justina Fugh, Senior Counsel for Ethics, 202-564-1786 or fugh.justina@epa.gov

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Message

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Sent: 1/9/2017 10:50:59 PM
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Subject: YES! It's officially time to start thinking about your financial disclosure report (again!)

Happy New Year!

You are on our list as a person who has an annual requirement to file the public financial disclosure report (the OGE 278). Lucky you! It is officially time to remind you that your next form (reporting on calendar year 2016) will be due to OGC/Ethics by May 15, 2017. TOMORROW, Dan Fort will assign the "incumbent" report to you.

FILING THE REPORT IN INTEGRITY

Once again, you must use INTEGRITY to submit your form. Sign into INTEGRITY (<https://www.integrity.gov>) and you'll be asked to confirm or update your contact information. After that, go to the "My Tasks" dashboard. We have assigned your incumbent filing to you, so go ahead and open your report and get started. You can pre-populate your report with your previous INTEGRITY filing (hooray!) and you can upload any OGE-278T (Periodic Transaction) forms that you filed in INTEGRITY. If you don't see an assigned report, then send an email to ethics@epa.gov and we'll make sure you are assigned one.

Some INTEGRITY Access Reminders:

- You need an up-to-date internet browser. INTEGRITY requires Internet Explorer 10 and above, Firefox 31.0 or greater, Safari 5 or greater, Google Chrome 36.0 or greater. While INTEGRITY works in all types of browsers, our experience is that it works best in Google Chrome.
- To get to INTEGRITY, go to <https://www.integrity.gov>. INTEGRITY will then route you to the OMB's secure system, MAX.gov, for authentication.
- Your current MAX.gov ID is your EPA email address.
- For problems with MAX.gov, contact them directly for assistance at: MAXSupport@max.gov or call them at 202-395-6860.

- INTEGRITY has helpful resource tools, but you need to be logged on to see them. To learn more about INTEGRITY, check out the “For Filers” tab on the INTEGRITY resource page. If you are having any problems with INTEGRITY itself, check out the information on the OGC/Ethics website at <http://intranet.epa.gov/ogc/Integrity/Landingpage.html> or send an email to ethics@epa.gov.

FILING DEADLINE

Your report will be due in INTEGRITY no later than midnight on Monday, May 15, 2017. If you need an extension, you have to ask me before the deadline. You must provide an actual reason (e.g., workload, travel, need to gather paperwork) and tell us how long you need (45 or 90 additional days).

REMINDER: Transactions

Under the STOCK Act, you are required to report periodic transactions of stocks and bonds for yourself, your spouse and/or your dependent children every month. Most of you did a super job of reporting those transactions in INTEGRITY, using the 278T. You’ll be able to upload those 278T transactions directly into your annual report. But don’t forget that, for the annual filing, you also have to report on any transactions of more than \$1000 in mutual funds. So if you need a reminder about the reporting requirements, review the [ethics advisory](#) and the updated [chart](#).

Can I obtain an electronic version of my last certified 278 form?

Yes! It’s right there in INTEGRITY! You can find it yourself or, if you need help, send a note to ethics@epa.gov.

Things for EVERYONE to know

INTEGRITY saves partially completed forms for you so you can return anytime you want until you’re ready to submit your report. Be sure to submit the report by scrolling down to the “attestation” paragraph and then hitting the “submit” button. You’ll get confirmation that your form has been submitted.

If we have any comments or questions, we will correspond with you through INTEGRITY for any changes. Since this process is only our second year, we anticipate that there may still be inevitable growing pains, so take a deep breath and CALL US before you start throwing things at your computer. Once again this year, OGC fully intends to assess the \$200 late filing fee, so please don’t be late! And there are both civil and criminal penalties for failure to file the report or for falsification of information. The civil penalty is over \$56,000 and the criminal penalty is one year in jail. Yikes!

Who has to fill out the 278e form?

You have to file if you are in any of the following types of positions: Presidential Appointment/Senate confirmed (PAS), non-career SES, career SES, SL or ST, Schedule C, AD, ALJ or Title 42. You also have to fill out the form if you are detailed for more than 60 days into any of these positions. In addition, you have to file a termination report when you leave any of these positions, even if you occupied it on detail. A lot of people forget about the need to file a termination report, so bear in mind that the late filing fee and other penalties apply to the termination 278e too.

What if I need help understanding how to fill out the report?

Let’s face it: everyone hates this burden, and the fact that the form now looks different and is electronic has been an adjustment. Many of you have liked the new system while others of you appear to have found a new source for your anxiety nightmares. We in OGC/Ethics like the new system and are able and willing to help you. We will definitely be following up with you (again and again) about follow-up questions, which will only prolong your agony, so please just know that we’ll all get through this once again. We recommend that you check out the very useful [FAQs](#) created by the Office of Government Ethics. If you don’t think that you need the FAQs, think again!

Here are some important things to remember when filling out your form. Following these reminders will reduce the number of emails you’ll get from us):

- If you own a mutual fund, give its full name, not just "Vanguard" or "T Rowe Price." If you have a 5 letter trading symbol, that's helpful to add. But give us the name and the symbol, not just the symbol (we'll just have to look it up anyway).
- If you are legally married, you must report the assets of your spouse. For heterosexual couples, that's every state in the union. For same-sex couples, the federal government considers you to be married if your ceremony took place in a state that recognizes such marriages. Doesn't matter if you now live in a state that doesn't recognize such marriages.
- Own life insurance? If it's term life insurance (there's a death benefit if the insured dies during the term of the insurance), then it's NOT reportable! If it's whole or universal life, just report the cash value and type/amount of income. If it's variable life insurance (e.g., you can invest in various subaccounts, usually mutual funds), then report the underlying holdings
- Own your home or a second home? If you don't rent it out, then your home mortgage is NOT reportable (except for PAS employees). If you do rent it out, you'll need to report that income on Schedule A (and any mortgage on Schedule C). PAS employees must report all home mortgages, even if the home is not rented out. Please note: we need the city, state location of the property, but DO NOT list the street address
- Don't report any TSP (Thrift Savings Plan holdings) or any other U.S. Government benefits (e.g., your EPA salary or your spouse's federal salary)
- Own TIAA/CREF funds? You'll need to break those out for us by individual funds (e.g., TIAA Traditional Annuity, CREF Stock)
- Get any income from an outside position? You'll need to give us the exact amount. This is only for YOUR income. You have to report the source of spousal income (if from other than the US government), but you do not report the amount of spousal employment.
- Please remember that you are required to report any income from an asset even if it's held in a non-taxable or tax-deferred account such as an Individual Retirement Account (IRA) or 401(k). For reporting purposes, "income" is defined as dividends, interest and capital gains distributions (this last one is usually seen only from mutual funds). It is NOT the difference in how much the asset's worth changed from year to year.

Gifts and Travel Reimbursement

Don't forget that gifts and travel reimbursements may need to be reported on the financial disclosure report. You should examine the source of gifts and the reason it was given to you. Here's a synopsis of the gift reporting requirements for you:

Tangible gifts: you have to report gifts received in your personal capacity from a non-relative that exceed \$375. Any individual gift of \$150 or less from that same source may be excluded from the aggregation. Gifts from your significant other (who is by definition not a relative) must be reported, while gifts from your mother do not.

Gifts of travel: you have to report gifts received in your personal capacity from any source that exceed \$375. Any individual gift of \$150 or less from that same source may be excluded from the aggregation. DO NOT report gifts of travel that were accepted by OGC under 31 USC 1353 (using the ethics travel form) or 5 USC 7342 (Foreign Gifts and Decorations Act) if you were on official travel. DO report any gift of travel that was approved under 5 USC 4111 (the Government Employees Training Act) even if you were on official travel.

Gifts of free attendance: you may have to report any gift given because of your official position that fell under the widely attended gathering exception at 5 CFR 2635.204(g)(2). For example, if you attended a reception or other gathering, and the cost of the free attendance exceeded \$375, then you have to report that gift on your financial disclosure report. The reason is that the WAG rule makes clear that the employee who receives such a gift must be on annual leave or an excused absence, so the gift is to the individual employee and not to the Agency. Any individual gift of \$150 or less from that same source may be excluded from the aggregation.

Gifts from, say, VW: Any gifts from a prohibited source (like those VW gift cards for affected diesel cars) may have to be reported if the value exceeds the threshold. For example, I recently heard that other car

manufacturers (e.g., Ford and Kia) have given owners similar gifts because of fuel economy mistakes. Those gifts should have been reported (but we really don't plan on going back to correct the already-filed forms).

Are you sure I have to fill out the form?

If you are relatively new to your position, maybe not. If you entered your current position after November 1, 2016 -- and filed a report within 30 days of entering -- then you are NOT required to file this annual report. The reason is that officials who serve in covered positions for 60 days or less in the previous calendar year don't need to file the annual report. We'll catch up with you in May 2018.

However, if you entered your current position before November 1, 2016, then you may have to fill out the OGE-278 again, even if you really think you just finished answering all of OGC/Ethics' questions about your previous form. The requirement to file by May 16, 2017 is triggered by how long you've been in your position, not when you finally finished answering our pesky questions.

Oops, what if I don't think I ever filled out a report when I took my detail, or filled out a termination report when I left? PLEASE CALL me right away so that we can sort out what happened. If you were on detail, but aren't anymore, and didn't file a termination report with OGC/Ethics, then that's why you're receiving this message. I need your termination report so that I can remove you from the list of OGE-278 filers, and I may be able to waive the late filing fee.

Wait, how do I get the 278e form again?

HA! Trick question! The answer is that your report was assigned to you through INTEGRITY, so go look for the email from Integrity.gov <notifications@integrity.gov>

What's the reporting period again?

For most of you, this is not the first time you've had to complete the 278. We consider you to be "incumbents" in your positions, and you are required to file annually no later than May 15th this year. For incumbent filers (not the ones leaving soon), the reporting period is the preceding calendar year. Please note, though, that for parts on Agreements and Arrangements and Positions Outside the Government, you are required to report on the preceding calendar year up to the filing date, which can be a bit longer than just the preceding calendar year.

Oh, I'll never get it done by May 15th. How do I get an extension?

Just ask, but please do so in writing (email is fine) and provide a reason. Among the acceptable reasons are your travel schedule, heavy workload, or the need for additional time to gather materials. Please note that we can't grant an extension after the deadline has passed, so be sure to ask before the deadline.

What if I miss the deadline?

There is a 30-day grace period after the due date for you to file your form. If we receive your form after that 30 day grace period, then your form is considered late and you will be assessed a \$200 late filing fee. Unfortunately, OGC/Ethics had to assess the late filing fee several times this past year, so believe me, we know how to collect the money.

Is this the only time of year that I have to file this report?

It depends. If you leave EPA, then you may also have to file a termination report. A lot of people don't realize that they are required to file the termination report, so please make note of this obligation. Even if you were in a position on detail, you still have to file the termination report. We have to assign you a termination report, so please let us know your status.

What's a termination report, and when would I have to file that?

When you leave federal service --or when you leave a detail-- you have to file a termination 278 report no later than 30 days after your departure. You need to report on your holdings up to your last day, so that's why we ask that you don't submit the termination report any earlier than your last day. The reporting period for the termination report is the previous calendar year PLUS the current year up to the date of filing. If you are planning on working after EPA and

already have a job lined up, then you should have filed a STOCK Act notification report with OGC/Ethics and have to report that new employment in the "Agreements/Arrangements" section of the report.

What if I retire before May 15th. Do I have to file two reports and do I have to use INTEGRITY?

Please contact OGC/Ethics so we can assign you a termination report in INTEGRITY instead. Then you can file just one report (covering the previous calendar year + 2017 up to the date of departure).

I'm planning to retire after May 15th, but before August 15. What do I do?

If you are planning to leave federal service within 90 days after the May 15th, then contact OGC/Ethics for an extension. We'll assign you a combined incumbent/termination report instead of having to file two reports. The reporting period will be the previous calendar year up to the date of filing.

What if I am planning to retire after August 15th, but before the end of 2017?

You will have to file two reports, and both of them must be in INTEGRITY. You will file an incumbent report by May 15th, and we will have to assign you a termination report for you to file when you leave. Sorry.

Is there any way I can get out of filing a termination report?

Sure! If you leave EPA but go to another federal agency AND that new position also requires you to file a 278, then you will not need to file a termination report. You should, however, contact me for a copy of your current report so that you can give that to your new Designated Agency Ethics Official. Or, if they also use INTEGRITY, then we can alert them to the fact that they need to get your electronic file transferred over to them. That way, you will not have to do a "new entrant" report for your new position. But when you are on detail and leave a 278 position to return to your usual non-SES job at EPA, then you have to file a termination report within 30 days of leaving the detail.

What's a new entrant report? Are there different reporting periods for that?

When you enter a position -- either permanently or on detail for more than 60 days -- that requires a 278e, then you have to file a 278e within 30 days of taking the position. That's the "new entrant" report. You can fill out this report in advance of your first day in the position (unlike the termination report, which cannot be submitted until your last day). OGC/Ethics will assign you the "new entrant" report, which is different from the annual report.

How do I get my form to you?

Through INTEGRITY, of course! No more faxing or scanning or mailing!

Anything Else?

If you have any questions regarding any of your ethical responsibilities or have questions regarding your form, please feel free to contact any of us in OGC/Ethics. Thank you in advance for your attention to these matters!

Cheers,

OGC/Ethics (ethics@epa.gov)

Justina Fugh, Senior Counsel for Ethics, 202-564-1786 or fugh.justina@epa.gov

Daniel Fort, Ethics Officer, 202-564-2200 or fort.daniel@epa.gov

Jeanne Duross, Ethics Attorney, 202-564-6595 or duross.jeanne@epa.gov

Rich Lumley, Ethics Officer, 202-564-1453 or lumley.rich@epa.gov

(returning mid-March: Jennie Keith, Ethics Officer, 202-564-3412 or keith.jennie@epa.gov)

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Message

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Sent: 1/5/2016 11:10:15 PM
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Subject: IT'S PUBLIC FINANCIAL DISCLOSURE FILING TIME!

Hi there,

Last month, I told you that you will be using INTEGRITY, an electronic filing system, to file your financial disclosure reports in 2016. Well, it's officially 2016, so we just pushed out an email assigning your INTEGRITY report to you. Look for the notification that came from [Integrity.gov <notifications@integrity.gov>](mailto:notifications@integrity.gov). I'm warning you ... the new system looks totally different from what you used to do! For the handful of you who are super-competitive, let me say that we have already received our first official completed report for 2016 (and, no, it wasn't mine).

FILING DEADLINE

Your report will be due in INTEGRITY no later than midnight on Monday, May 16, 2016. If you need an extension, you have to ask before the deadline. You must provide a reason (e.g., workload, travel, need to gather paperwork) and tell us how long you need (45 or 90 additional days).

THE FINANCIAL DISCLOSURE REPORT

You must use INTEGRITY to submit your form if you are an incumbent filer. OGC/Ethics will not cheerfully accept paper forms any longer.

REMINDER: transactions

Many of you did a really good job remembering to report transactions on the 278T. Others of you, though, caused us to shake our heads ruefully. We waived the \$200 late filing fee for not filing the 278T, but starting now, you won't be able to rely on our patience. Effective immediately, you will have to use INTEGRITY to file any 278Ts for transactions in 2016. Remember, under the STOCK Act, you are required to report periodic transactions for yourself, your spouse and/or your dependent children every month. If you forgot the requirement, review the [ethics advisory](#) and the updated [chart](#)).

Can I obtain an electronic version of my last certified 278 paper form?

Yes! Just send an email to ethics@epa.gov and tell us what email address to use (your EPA address or, if you prefer, a personal email address).

Things for EVERYONE to know

You will know through INTEGRITY when you submit your report, and we will correspond with you through that system for any changes. Since this process is new to all of us, there will be some inevitable growing pains, so take a deep breath and CALL US if you start to feel like throwing things at your computer. Don't forget that penalties can be assessed for failure to file the report or for falsification of information. The civil penalty is \$50,000 and the criminal penalty is one year in jail. Once again this year, OGC fully intends to assess the \$200 late filing fee, so please don't be late!

Who has to fill out the 278e form?

You have to fill out this form if you are in any of the following types of positions: Presidential Appointment/Senate confirmed (PAS), non-career SES, career SES, SL or ST, Schedule C, AD, ALJ or Title 42. You also have to fill out the form if you are detailed for more than 60 days into any of these positions. In addition, you have to file a termination report when you leave any of these positions, even if you occupied it on detail. A lot of people forget about the need to file a termination report, so bear in mind that the late filing fee and other penalties apply to the termination 278e too.

What if I need help understanding how to fill out the report?

Let's face it: everyone hates this burden, and the fact that the form now looks different and is electronic will be an adjustment. We in OGC/Ethics will not be defeated by the system and will definitely be following up with you (again and again) about follow-up questions, which will only prolong your agony. I recommend that you check out the very useful [FAQs](#) created by the Office of Government Ethics at [If you don't think that you need the FAQs, think again!](#)

Here are some important things to remember when filling out your form. Following these reminders will reduce the number of emails you'll get from us):

- If you own a mutual fund, give its full name, not just "Vanguard" or "T Rowe Price." If you have a 5 letter trading symbol, that's helpful to add. But give us the name and the symbol, not just the symbol (we'll just have to look it up anyway).
- If you are legally married, you must report the assets of your spouse. For heterosexual couples, that's every state in the union. For same-sex couples, the federal government considers you to be married if your ceremony took place in a state that recognizes such marriages. Doesn't matter if you now live in a state that doesn't recognize such marriages.
- Own life insurance? If it's term life insurance (there's a death benefit if the insured dies during the term of the insurance), then it's NOT reportable! If it's whole or universal life, just report the cash value and type/amount of income. If it's variable life insurance (e.g., you can invest in various subaccounts, usually mutual funds), then report the underlying holdings
- Own your home or a second home? If you don't rent it out, then your home mortgage is NOT reportable (except for PAS employees). If you do rent it out, you'll need to report that income on Schedule A (and any mortgage on Schedule C). PAS employees must report all home mortgages, even if the home is not rented out. Please note: we need the city, state location of the property, but DO NOT list the street address
- Don't report any TSP (Thrift Savings Plan holdings) or any other U.S. Government benefits (e.g., your EPA salary or your spouse's federal salary)
- Own TIAA/CREF funds? You'll need to break those out for us by individual funds (e.g., TIAA Traditional Annuity, CREF Stock)
- Get any income from an outside position? You'll need to give us the exact amount. This is only for YOUR income. You have to report the source of spousal income (if from other than the US government), but you do not report the amount of spousal employment.

Gifts and Travel Reimbursement

Don't forget that gifts and travel reimbursements may need to be reported on the financial disclosure report. You should examine the source of gifts and the reason it was given to you. Here's a synopsis of the gift reporting requirements for you:

Tangible gifts: you have to report gifts received in your personal capacity from a non-relative that exceed \$375. Any individual gift of \$150 or less from that same source may be excluded from the aggregation. Gifts from your significant other (who is by definition not a relative) must be reported, while gifts from your mother do not.

Gifts of travel: you have to report gifts received in your personal capacity from any source that exceed \$375. Any individual gift of \$150 or less from that same source may be excluded from the aggregation. DO NOT report gifts of travel that were accepted by OGC under 31 USC 1353 (using the ethics travel form) or 5 USC 7342 (Foreign Gifts and Decorations Act) if you were on official travel. DO report any gift of travel that was approved under 5 USC 4111 (the Government Employees Training Act) even if you were on official travel.

Gifts of free attendance: you may have to report any gift given because of your official position that fell under the widely attended gathering exception at 5 CFR 2635.204(g)(2). For example, if you attended a reception or other gathering, and the cost of the free attendance exceeded \$375, then you have to report that gift on your financial disclosure report. The reason is that the WAG rule makes clear that the employee who receives such a gift must be on annual leave or an excused absence, so the gift is to the individual employee and not to the Agency. Any individual gift of \$150 or less from that same source may be excluded from the aggregation.

Gifts from, say, VW: Any gifts from a prohibited source (like those VW gift cards for affected diesel cars) may have to be reported if the value exceeds the threshold. For example, I recently heard that other car manufacturers (e.g., Ford and Kia) have given owners similar gifts because of fuel economy mistakes. Those gifts should have been reported (but we really don't plan on going back to correct the already-filed forms).

Are you sure I have to fill out the form?

If you are relatively new to your position, maybe not. If you entered your current position after November 1, 2015 -- and filed a report within 30 days of entering -- then you are NOT required to file this annual report. The reason is that officials who serve in covered positions for 60 days or less in the previous calendar year don't need to file the annual report. We'll catch up with you in May 2017.

However, if you entered your current position before November 1, 2015, then you may have to fill out the OGE-278 again, even if you really think you just finished answering all of OGC/Ethics' questions about your previous form. The requirement to file by May 16, 2016 is triggered by how long you've been in your position, not when you finally finished answering our pesky questions.

Oops, what if I don't think I ever filled out a report when I took my detail, or filled out a termination report when I left? PLEASE CALL me right away so that we can sort out what happened. If you were on detail, but aren't anymore, and didn't file a termination report with OGC/Ethics, then that's why you're receiving this message. I need your termination report so that I can remove you from the list of OGE-278 filers, and I may be able to waive the late filing fee.

Wait, how do I get the 278e form again?

HA! Trick question! The answer is that your report was assigned to you through INTEGRITY, so go look for the email from Integrity.gov <notifications@integrity.gov>

What's the reporting period again?

For most of you, this is not the first time you've had to complete the 278. We consider you to be "incumbents" in your positions, and you are required to file annually no later than May 16th this year. For incumbent filers (not the ones leaving soon), the reporting period is the preceding calendar year. Please note, though, that for parts on Agreements and Arrangements and Positions Outside the Government, you are required to report on the preceding calendar year up to the filing date, which can be a bit longer than just the preceding calendar year.

Oh, I'll never get it done by May 16th. How do I get an extension?

Just ask, but please do so in writing (email is fine) and provide a reason. Among the acceptable reasons are your travel schedule, heavy workload, or the need for additional time to gather materials. Please note that we can't grant an extension after the deadline has passed, so be sure to ask before the deadline.

What if I miss the deadline?

There is a 30-day grace period after the due date for you to file your form. If we receive your form after that 30 day grace period, then your form is considered late and you will be assessed a \$200 late filing fee. Unfortunately, OGC/Ethics had to assess the late filing fee several times this past year, so believe me, we know how to collect the money.

Is this the only time of year that I have to file this report?

It depends. If you leave EPA, then you may also have to file a termination report. A lot of people don't realize that they are required to file the termination report, so please make note of this obligation. Even if you were in a position on detail, you still have to file the termination report. We have to assign you a termination report, so please let us know your status.

What's a termination report, and when would I have to file that?

When you leave federal service --or when you leave a detail-- you have to file a termination 278 report no later than 30 days after your departure. You need to report on your holdings up to your last day, so that's why we ask that you don't submit the termination report any earlier than your last day. The reporting period for the termination report is the previous calendar year PLUS the current year up to the date of filing.

What if I retire before May 15th. Do I have to file two reports and do I have to use INTEGRITY?

If you anticipate leaving EPA relatively soon, then please contact me or ethics@epa.gov. If I can and you are interested, then I might be able to allow you to file a termination report using the new paper 278e instead of INTEGRITY. If you want to try to use INTEGRITY anyway, then we will need to adjust our records and assign a different kind of report to

you -- a combined incumbent/termination report, not just the incumbent report -- which is an additional step. The good news is that you'll still only have one more report to file, but the bad news is that you'll have to either do it using a new and weird looking form or in INTEGRITY.

I'm planning to retire after May 15th. What do I do?

If you are planning to leave federal service within 90 days after the May 15th, then contact OGC/Ethics for an extension. We'll figure out a way for you to file the combined incumbent/termination report instead of having to file two reports, and you may have the option of using INTEGRITY or the paper 278e. Again, please note that the reporting period will be the previous calendar year up to the date of filing.

What if I am planning to retire after August 15th, but before the end of 2016?

You will have to file two reports, and both of them must be in INTEGRITY. You will file an incumbent report by May 16th and also file a separate termination report when you leave. Sorry.

Is there any way I can get out of filing a termination report?

Sure! If you leave EPA but go to another federal agency AND that new position also requires you to file a 278, then you will not need to file a termination report. You should, however, contact me for a copy of your current report so that you can give that to your new Designated Agency Ethics Official. That way, you will not have to do a "new entrant" report for your new position. But when you are on detail and leave a 278 position to return to your usual non-SES job at EPA, then you have to file a termination report within 30 days of leaving the detail.

What's a new entrant report? Are there different reporting periods for that?

When you enter a position -- either permanently or on detail for more than 60 days -- that requires a 278e, then you have to file a 278e within 30 days of taking the position. That's the "new entrant" report. You can fill out this report in advance of your first day in the position (unlike the termination report, which cannot be submitted until your last day). OGC/Ethics will assign you the "new entrant" report, which is different from the annual report.

How do I get my form to you?

Through INTEGRITY, of course! No more faxing or scanning or mailing!

Anything Else?

If you have any questions regarding any of your ethical responsibilities or have questions regarding your form, please feel free to contact any of us in OGC/Ethics. Thank you in advance for your attention to these matters!

Cheers,

OGC/Ethics (ethics@epa.gov)

Justina Fugh, Senior Counsel for Ethics, 202-564-1786 or fugh.justina@epa.gov

Daniel Fort, Ethics Officer, 202-564-2200 or fort.daniel@epa.gov

Jennie Keith, Ethics Specialist, 202-564-3412 or keith.jennie@epa.gov

Jeanne Duross, Ethics Attorney, 202-564-6595 or duross.jeanne@epa.gov

Sent by: Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 Ariel Rios North | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | cell 202-731-3631 | fax 202-564-1772

From: Fugh, Justina
Sent: Friday, December 18, 2015 1:37 PM
Subject: INTRODUCING... electronic 278 filing for next year!

Dear 278 filers –

Electronic filing is almost here! Beginning January 1, 2016, EPA will use INTEGRITY, a secure, web-based electronic system created by the Office of Government Ethics (OGE) for the filing of public financial disclosure forms. This new electronic system will be the ONLY way for you to file your annual report and periodic transaction reports (the OGE -278-T), and the only way that OGC/Ethics will accept any new entrant 278s. Beginning in January 1, 2016, EPA will no longer accept the familiar paper version of the 278 for any report at all.

One small note: if you will be retiring on or before 12/31/15, you can use the paper version of the 278. But if you will be retiring in early 2016, then you can't use that familiar form but I won't make you use INTEGRITY. Instead, if all you need to do is to file a termination report in early 2016, then contact me so that I can send you the 278e to use instead.

For all of you incumbent filers, you're moving to an entirely electronic filing environment. You will now be able to report your financial information more quickly and completely, and ethics officials can be more efficient in reviewing your information. The key benefits of INTEGRITY include:

- User-friendly navigation to guide you "step-by-step"
- Secure online availability anywhere you have Internet access
- Compatibility with most Internet browsers
- Elimination of paper and mailing to OGC/Ethics, and
- Eventual reduction of report preparation time (after initial entry, INTEGRITY will "pre-populate" your report in subsequent years).

PLEASE NOTE: We will not activate your tasks in INTEGRITY until after January 1, 2016. So, right now, you don't have any tasks assigned to you. But if you want, you can access your account now and set your password and get familiar with the system. Early next year, we'll assign the incumbent report to you so you can start working. INTEGRITY will let you save a partially completed form and return to it later. As always, your report will be due in mid-May (specifically, Monday, May 16, 2016).

Here are the **steps to follow for INTEGRITY** (after January 1, 2016):

1. Make sure your internet browser is up to date. INTEGRITY works well on most internet browsers, but you will need to use Internet Explorer 10 and above, Firefox 31.0 or greater, Safari 5 or greater, Google

Chrome 36.0 or greater. The Agency's internal standard browser is Internet Explorer 11.0 so you will be able to access INTEGRITY from your EPA computer.

2. Go to <https://www.INTEGRITY.gov> . INTEGRITY will then route you to OMB's secure system, MAX.gov, for authentication. OGC/Ethics has already created an INTEGRITY account for you but has not yet assigned any tasks to complete. If you want to get started early, you can set up your password and profile now.
 - Your MAX.gov ID is your EPA email address
 - If you have used MAX.gov in the past, use the password you've already created to access your account (reset that password if you forgot or it's now expired)
 - If you've never used MAX.gov, then you'll be prompted to create a password

For problems with MAX.gov, contact them directly for assistance at:
<https://max.gov/maxportal/webPage/contactUs.action>

3. When you first log-in to INTEGRITY, you will see a contact information screen to review and complete. At the bottom, indicate that you have read and agree to the User Agreement, then click Submit to view your account. Remember, you won't see any "assigned tasks" until after January 1, 2016.
4. Starting January 1, 2016, you will have to use INTEGRITY to file your Periodic Transaction Disclosure Reports (the OGE-278-T). You can file an OGE-278-T at any time, so you don't have to wait for a report is assigned to you. Just go to the "My Tasks" dashboard, scroll to the "My Tools" area, and click on "278T."
5. INTEGRITY has helpful resource tools, but you need to be logged on to see them. To learn more about INTEGRITY, check out the "For Filers" tab on this resource page [Learn About INTEGRITY](#) . There are short videos on how to use the form, how to file a 278T, and a comparison to the old form.

Want EPA-specific help?

OGC/Ethics has created an intranet web page at [OGC/Ethics INTEGRITY](#) for you to use to get started and to provide a "landing place" for lots of useful references for using INTEGRITY. Be sure to check out the "INTEGRITY System Overview for New Users" first!

As always, we in OGC/Ethics love to hear from you! Our email is ethics@epa.gov or you can reach us individually as follows:

Jeanne Duross	duross.jeanne@epa.gov	202 564 6595
Daniel Fort	fort.daniel@epa.gov	202 564 2200
Justina Fugh	fugh.justina@epa.gov	202 564 1786
Jennie Keith	keith.jennie@epa.gov	202 564 3412

Thanks for your attention to ethics matters. If you've made your way all the way down to the end of this message, then I'm proud of you, but still won't excuse you from taking your ethics training. Here's that link: [2015 Annual Ethics Training](#) .

Happy Holidays!
Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

Message

From: Fugh, Justina [Fugh.Justina@epa.gov]
Sent: 4/6/2016 6:01:41 PM
To: Aguirre, Amanda [Aguirre.Amanda@epa.gov]; Akinnusotu, Bunmi [Akinnusotu.Bunmi@epa.gov]; Allen, Ebonye [Allen.Ebonye@epa.gov]; Allen, Laura [Allen.Laura@epa.gov]; Allnutt, David [Allnutt.David@epa.gov]; Anastas, Nicholas [Anastas.Nicholas@epa.gov]; Ankley, Gerald [Ankley.Gerald@epa.gov]; Araujo, Rochelle [Araujo.Rochelle@epa.gov]; Badalamente, Mark [Badalamente.Mark@epa.gov]; Bahadori, Tina [Bahadori.Tina@epa.gov]; Banister, Beverly [Banister.Beverly@epa.gov]; Barr, Pamela [Barr.Pamela@epa.gov]; Bartsch, Charlie [Bartsch.Charlie@epa.gov]; Bashista, John [Bashista.John@epa.gov]; Battaglia, Amy [Battaglia.Amy@epa.gov]; Battin, Andrew [Battin.Andrew@epa.gov]; Beauvais, Joel [Beauvais.Joel@epa.gov]; Behl, Betsy [Behl.Betsy@epa.gov]; Benforado, Jay [Benforado.Jay@epa.gov]; Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]; Best-Wong, Benita [Best-Wong.Benita@epa.gov]; Binder, Bruce [Binder.Bruce@epa.gov]; Blake, Wendy [Blake.Wendy@epa.gov]; Blevins, John [Blevins.John@epa.gov]; Bloom, David [Bloom.David@epa.gov]; 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CC: Fort, Daniel [Fort.Daniel@epa.gov]; Keith, Jennie [Keith.Jennie@epa.gov]; Duross, Jeanne [Duross.Jeanne@epa.gov]

Subject: REMINDER: your public financial disclosure report is due 5/16/16

Attachments: INTEGRITY Minimum System Settings.pdf; OGE Form 278 - 278e Compared-1.pdf

Hello (can you hear me? I've been dreamin' about the way things used to be ...) –

Alas, the era of filing your paper financial disclosure report is over. You will file your next 278 -- due by May 16th -- using the electronic filing system, INTEGRITY. OGC/Ethics no longer accepts annual paper 278s or 278-Ts. NOTE: if you're retiring in 2016, then you can ask us to accept a paper termination report -- the 278e -- which looks quite different from the prior format.

What is INTEGRITY?

It's a secure, web-based electronic system created by the Office of Government Ethics (OGE) for the filing of public financial disclosure forms. It allows you to report your financial information more quickly and completely, and helps ethics officials be more efficient in reviewing your information. Attached below is a side-by-side comparison of the old familiar form against the new format for your information.



OGE Form 278 -
278e Compared-...

Is INTEGRITY hard to use?

Most of EPA's early users report good things about their INTEGRITY experience. The key benefits are user-friendly navigation to guide you through every step, secure online availability anywhere you have internet access, compatibility with most browsers and eventual reduction of report preparation time (after initial entry, INTEGRITY will "pre-populate" your report in subsequent years). Plus, you can save a partially completed form and return to it later. As with all new things, though, you may have some initial hiccups but we're sure it -- or you -- will get better.

What do I have to do?

You have already been assigned an incumbent report (which is why, every week, you get an automatic reminder from integrity.gov about your filing assignment). Start by going to <https://www.INTEGRITY.gov>. INTEGRITY will then route you to OMB's secure system, MAX.gov, for authentication. Your MAX.gov ID is your EPA email address. If you have used MAX.gov in the past, you can use that password already created to access your account or reset the password if expired. If you've never used MAX.gov, then you'll be prompted to create a password. When you first log-in to INTEGRITY, you will see a contact information screen to review and complete. At the bottom, click to say that you agree to the User Agreement then click Submit to view your account.

What if I have a connection problem?

Make sure your internet browser is up to date (check out the fact sheet below). INTEGRITY works well on most internet browsers, but you will need to use Internet Explorer 10 and above, Firefox 31.0 or greater, Safari 5 or greater, Google Chrome 36.0 or greater. The Agency's internal standard browser is Internet Explorer 11.0 so you can access INTEGRITY from your EPA computer.



INTEGRITY
Minimum System...

What if I need more help?

For problems with access to MAX.gov, send an email to maxsupport@omb.eop.gov or call 202-395-6860. Their support hours are weekdays from 8:30 am to 9:00 pm EDT, and weekends from 9:00 am to 6:00 pm EDT. Once in INTEGRITY, you can check out the "For Filers" tab on this resource page [Learn About INTEGRITY](#). There are also short videos on how to use the form and how to file a 278T. And OGC/Ethics created an intranet web page at [OGC/Ethics INTEGRITY](#) that gives you a "landing place" for lots of useful references for using INTEGRITY. Be sure to check out the "INTEGRITY System Overview for New Users" first.

How to file a 278-T

You can file an OGE-278-T at any time. Just go to the "My Tasks" dashboard, scroll to the "My Tools" area, and click on "278T."

How to contact OGC/Ethics

As always, we in OGC/Ethics love to hear from you! Our email is ethics@epa.gov or you can reach us individually as follows:

Jeanne Duross	duross.jeanne@epa.gov	202 564 6595
Daniel Fort	fort.daniel@epa.gov	202 564 2200
Justina Fugh	fugh.justina@epa.gov	202 564 1786
Jennie Keith	keith.jennie@epa.gov	202 564 3412

And finally ...

We have already certified 16% of the overall EPA public filer population. We are looking forward to having YOU join those ranks!

Enjoy your electronic filing this year!
Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

Minimum System Settings & Browsers

INTEGRITY works securely with these general settings and common internet browsers.

Settings:

- Javascript must be enabled.
- Cookies must be enabled.
- Transport Layer Security (TLS) must be enabled.
- Minimum recommended screen resolution:
 - Desktops: 1280 x 1024
 - Laptops 1366 x 768
 -

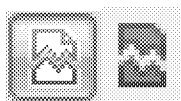
Internet browsers:

- Google Chrome 36.0 or greater;
- Internet Explorer (IE) 10.0 and 11.0 (Note: IE 9 users must also install and enable Adobe Flash Player. IE 9 users may encounter some display issues.)
- Firefox 31.0 or greater;
- Safari 5 or greater.

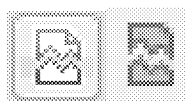
Microsoft Internet Explorer 10 and above

- Enable JavaScript:
 - Click on “Tools” (gear icon), and then “Internet Options.”
 - Click the “Security” tab.
 - Select “Trusted Sites” (check mark icon).
 - Click “Sites”.
 - Paste the *INTEGRITY* URL, <https://integrity.gov> in the “Add this website to the zone” dialog box and click “Add” then click “Close” near the bottom of the dialog box.
 - Click “OK” when you are back on the Internet Options – Security tab to finish.
- Enable cookies:
 - Click on “Tools” (gear icon), and then “Internet Options.”
 - Click the “Privacy” tab.
 - Click “Sites”.
 - Paste the *INTEGRITY* URL, <https://integrity.gov> in the “Address of website” dialog box and click “Allow” then click “OK” at the bottom right of the dialog box.
 - Click OK.
- Enable TLS:
 - Click on “Tools” (gear icon), and then “Internet Options.”
 - Click the “Advanced” tab.
 - Under “Security,” check the following options:
 - Use TLS 1.0.
 - Use TLS 1.1.
 - Use TLS 1.2 (preferred).
- Click OK.
- Compatibility View:
 - To turn OFF Compatibility View in IE11:
 - Click the gear icon in the top right corner;

- Click “Compatibility View” settings;
- If “integrity.gov” displays under “Websites you’ve added to Compatibility View,” select “integrity.gov” from the list and click “Remove.”
- To turn OFF Compatibility View in IE9 and IE10:
 - If Compatibility View is on, the icon next to your address/URL bar will look similar to one of the two icons below:



- Clicking on the icon will toggle Compatibility View on and off.
- To use Integrity.gov, turn Compatibility View OFF by clicking the icon until it looks similar to one of the two icons below:



Google Chrome 36 and above

- Enable JavaScript:
 - Click “Customize and control Google Chrome” (list icon), and then “Settings.”
 - Click “Show advanced settings.”
 - Under “Privacy,” click “Content settings.”
 - Under JavaScript, click “Allow all sites to run JavaScript (recommended).”
- Enable Cookies:
 - Click “Customize and control Google Chrome” (list icon), and then “Settings.”
 - Click “Show advanced settings.”
 - Under “Privacy,” click “Content settings.”
 - Under “Cookies,” select “Allow local data to be set (recommended).”
- Enable TLS:
 - As of Google Chrome 19, no configuration should be needed to enable TLS.
 - If you or your Agency disabled TLS, please contact your system administrator for help in enabling it. Directions provided below are for reference only.
 - Click “Customize and control Google Chrome” (list icon), and then Settings.
 - Click “Show advanced settings.”
 - Click “Change proxy settings” under Network.
 - Click the Advanced tab.
 - Under Security, check the following options:
 - Use TLS 1.0
 - Use TLS 1.1
 - Use TLS 1.2

Mozilla Firefox 30 and above

- Enable JavaScript:
 - As of Firefox 23, no configuration should be needed to enable JavaScript.

- If you or your Agency disabled Javascript in Firefox 23 or above, please contact your system administrator for help in enabling it.
- Enable Cookies
 - Click the “Menu” button (list icon), and then “Options.”
 - Select “Privacy.”
 - Under “History,” set “Firefox will:” to “Use custom settings for history.”
 - Check “Accept cookies from sites.”
 - Set “Accept third party cookies” to either “Always” or “From visited.”
 - Set “Keep until” to “They expire.”
 - Click “OK.”
- Enable TLS:
 - As of Firefox 23, no configuration should be needed to enable TLS.
 - If you or your Agency disabled TLS in Firefox 23 or above, please contact your system administrator for help in enabling it.

Apple Safari 6 and above.

- Enable JavaScript:
 - Select “Safari” from the Apple/System bar at the top of the screen.
 - From the drop-down menu, select “Preferences.”
 - Select “Security.”
 - Under “Web content,” check “Enable JavaScript.”
 - Close the window to save your changes.
- Enable Cookies:
 - Select “Safari” from the Apple/System bar at the top of the screen.
 - From the drop-down menu, select “Preferences.”
 - In the “Safari preferences” window, click “Privacy.”
 - Next to “Block cookies,” select either “From third parties and advertisers” or “Never.”
- Enable TLS: If you or your Agency disabled TLS, please contact your system administrator for help in enabling it.

Send any comments or questions about this information to Integrity@oge.gov

These charts map the OGE Form 278 to the new OGE Form 278e. Use these charts to help inform filers.

OGE Form 278 Sections & Schedules	OGE Form 278e Parts (<i>INTEGRITY</i>)
Cover Page	Cover Page
Schedule A: Assets and Income	Part 2: Filer's Employment Assets and Income; Part 5: Spouse's Employment Assets and Income; Part 6: Other Assets and Income
Schedule B, Part I: Transactions	Part 7: Transactions
Schedule B, Part II: Gifts, Reimbursements, and Travel Expenses	Part 9: Gifts and Travel Reimbursements
Schedule C, Part I: Liabilities	Part 8: Liabilities
Schedule C, Part II: Agreements or Arrangements	Part 3: Filer's Employment Agreements and Arrangements
Schedule D, Part I: Positions held Outside the U.S. Government	Part 1: Filer's Positions Held Outside United States Government
Schedule D, Part II: Compensation in Excess of \$5,000 Paid by One Source	Part 4: Filer's Sources of Compensation Exceeding \$5,000 in a Year

OGE Form 278e Parts (<i>INTEGRITY</i>)	OGE Form 278 Sections & Schedules
Cover Page	Cover Page
Part 1: Filer's Positions Held Outside United States Government	Schedule D, Part I: Positions held Outside the U.S. Government
Part 2: Filer's Employment Assets and Income	Schedule A: Assets and Income
Part 3: Filer's Employment Agreements and Arrangements	Schedule C, Part II: Agreements or Arrangements
Part 4: Filer's Sources of Compensation Exceeding \$5,000 in a Year	Schedule D, Part II: Compensation in Excess of \$5,000 Paid by One Source
Part 5: Spouse's Employment Assets and Income	Schedule A: Assets and Income
Part 6: Other Assets and Income	Schedule A: Assets and Income
Part 7: Transactions	Schedule B, Part I: Transactions
Part 8: Liabilities	Schedule C, Part I: Liabilities
Part 9: Gifts and Travel Reimbursements	Schedule B, Part II: Gifts, Reimbursements, and Travel Expenses

Message

From: Fugh, Justina [Fugh.Justina@epa.gov]
Sent: 4/20/2016 3:25:36 PM
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Subject: REMINDER: Your public financial disclosure report is due Monday, May 16th!
Attachments: Disable IE Compatibility Mode.pdf; When to Report Transactions on the OGE 278 and Sched B - January 2013 ch....docx; ATT36456; ATT90412

Hi there,

You are required to file an incumbent public financial disclosure report (the OGE 278) but haven't done so yet (or we haven't certified it yet). Maybe you're working on it or maybe you're hoping it will go away (HA!). Unless you have been living under a rock, you know that you get to file *electronically* this year, using *INTEGRITY*. If you think that you're getting this notification in error, then contact me so I can figure out what's going on. If you're a person acting in an SES position, then you are still obliged to file this report. If you've left the acting position, then you were supposed to file a termination report, so you are still on my list and need to talk to me.

This email gives you basic information about filing in *INTEGRITY*. You are already receiving notifications (okay, multiple ones) from *INTEGRITY.gov* reminding you to file your report, but since you've been putting it off for a while now, you can keep putting it off for a couple more days. NOTE: *INTEGRITY* is off line until Friday, April 22 for some maintenance work. But do bear in mind that you have only four more weekends until the report is due.

DESPERATE FOR AN EXTENSION?

Yes, we still cheerfully grant extensions. Send an email to Justina or ethics@epa.gov to request an extension of either 45 or 90 days, and give a reason (e.g., workload, travel, need to gather paperwork).

PLANNING TO RETIRE OR LEAVE EPA BEFORE AUGUST 15, 2016?

If so, let me know. I may be able to let you file a paper report instead that covers all of CY 2015 and CY 2016 up to the date you depart.

IS IT OKAY TO LIVE UNDER THE ROCK AND IGNORE THIS OBLIGATION?

Really not okay. Remember that we can (and will) fine you \$200 for missing the filing deadline.

HOW TO GET STARTED

1. Go to the *INTEGRITY* landing page, <https://integrity.gov>, and click on "**Login to Integrity.**" (Do not click on the violin in the picture. That's just a picture! You need to click in the box that says "Login to Integrity") This is the *INTEGRITY* landing page:



2. After you click on the login button (not the violin), you will see the MAX.gov login screen (see below). Enter your MAX.gov user ID (which is your EPA email address) and your password. If you have never logged in to MAX.gov or forgot your password, then click on the “Forgot, set, or change your password?” link and follow the on-screen prompts to create or re-set your password on MAX.gov.

3. Next you will see a partially completed “**Contact Information**” screen. Review and update the information, read the appropriate *User Agreement and Rules of Behavior*, check the checkbox to acknowledge that you read and agree to it, and then click **Submit**. **You must agree to the User Agreement in order to use the system.**

STARTING YOUR 278

1. *INTEGRITY* displays your **My Tasks** dashboard. To start your Assigned OGE Form 278, click on **Start** in the row to the right. After you click Start (or Update if you already started your 278), *INTEGRITY* will display questions for you to answer to report your financial holdings.

2. As you enter your information, the wizard will build your report based on your answers.

This navigation menu on the left side of the screen will expand to show the different parts applicable to your situation based on your answers. As you finish a section of the report, the title will appear in this “table of content” view. At the left is a sample report that shows the nine parts starting with Federal Positions through Gifts and Reimbursements. These work like hyperlinks -- click on a title to jump to that part of your report. Click **Submit** to file your report.

To edit data, click on the **Report Data (Summary)** link in the left-side navigation bar, then click on **Edit** on the right hand side of each part to edit it. You may edit any data entered through the wizard screens as well as add more entries. Be sure to **Save** your changes.

If you want to print your report, click the **Printable View** button near the bottom of the left-side navigation. Use your Internet browser’s print tool to save or print or select Export to PDF. You may print a copy at any time you see the Printable View button in the left-side navigation. Do not send OGC/Ethics a pdf of your report. We can see it electronically through *INTEGRITY*.

3. The electronic form gathers the same information that you are used to reporting, but in a different format. For example, you can now report your assets separately from your spouse’s, and report your joint assets under “other assets.” You still need to report on the following three categories of financial interests: earned income, assets obtained from an employer or through employment, and retirement plans. Here is a chart that compares the old form against the new format:



When to Report
Transactions on t...




Disable IE
Compatibility Mo...

If you experience a frozen screen when displaying *Integrity*:

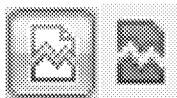
- A browser issue is likely the culprit. First verify the user's browser is supported by Integrity. You must use Internet Explorer (IE) 10 or greater, Google Chrome 36 or greater, Firefox 31 or greater, or Safari 6 or greater. Integrity also works with IE 9 if Adobe flash player installed. We can provide the link: <http://www.whatsmybrowser.org/> if the user is not clear on what browser they use.
- Internet Explorer users should disable "compatibility mode" while in Integrity, as it is known to cause navigation problems. Instructions below.

Disabling Compatibility Mode in IE11:

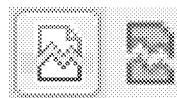
- Click the gear icon in the top right corner; 
- Click "Compatibility View" settings;
- If "integrity.gov" displays under "Websites you've added to Compatibility View," select "integrity.gov" from the list and click "Remove."

Disabling Compatibility Mode in IE9 and IE10:

- If Compatibility View is on, the icon next to your address/URL bar will look similar to one of the two icons below:



- Clicking on the icon will toggle Compatibility View on and off.
- To use Integrity.gov, turn Compatibility View OFF by clicking the icon until it looks similar to one of the two icons below:



Alternate way to turn OFF Compatibility View in IE9, IE10 and IE11:

- Press the "Alt" key on your keyboard, this will make the menu bar appear.
- Click the "Tools" menu item; 
- Select "Compatibility View" settings option;
- Make sure the "Display all websites in Compatibility View" check box is unchecked.
- Make sure the "Display intranet sites in Compatibility View" check box is unchecked.
- If "integrity.gov" displays under "Websites you've added to Compatibility View," select "integrity.gov" from the list and click "Remove."

When to Report Transactions

This table is effective as of January 1, 2013 and is for informational purposes only. Email [[HYPERLINK "mailto:ethics@epa.gov"](mailto:ethics@epa.gov)] with any specific questions.

	Periodic Transaction Report	Annual and/or Termination Report
Investment Assets	Report on the OGE 278-T?	Report on Schedule B of the OGE 278?
Transactions of \$1,000 or less		
• Any asset in which the transaction amount is \$1,000 or less regardless of the type of asset or who owns the asset	No	No
Your investment assets (or jointly held)		
• Your stocks	Yes	Yes
• Your bonds (except U.S. Treasury securities)	Yes	Yes
• Your commodity futures	Yes	Yes
• Your other investment securities	Yes	Yes
• Assets listed above in your (joint) brokerage accounts, (joint) managed accounts, IRAs, other retirement accounts, and/or other (joint) investment vehicles	Yes	Yes
Your spouse's investment assets		
• Spouse's stocks	Yes	Yes
• Spouse's bonds (except U.S. Treasury securities)	Yes	Yes
• Spouse's commodity futures	Yes	Yes
• Spouse's other investment securities	Yes	Yes
• Assets listed above in spouse's <u>own</u> brokerage account, managed accounts, IRAs, other retirement accounts, and/or other investment vehicles	Yes	Yes
Your dependent child's investment assets		
• Dependent child's stocks	Yes	Yes
• Dependent child's bonds (except U.S. Treasury securities)	Yes	Yes
• Dependent child's commodity futures	Yes	Yes
• Dependent child's other investment securities	Yes	Yes
• Assets listed above in dependent child's <u>own</u> brokerage account, IRAs, and/or other investment vehicles	Yes	Yes
Other investment assets irrespective of ownership		
• Real Property	No	Yes ¹
• Mutual funds, exchange traded funds, index funds and/or other "excepted investment funds" ²	No	Yes
• Any asset in which the transaction amount is \$1,000 or less	No	No
• Cash accounts (deposits and/or withdrawals)	No	No
• Money market accounts	No	No
• Money market funds	No	No
• Certificates of deposits	No	No
• US Treasury Securities (e.g., T bills, Treasury bonds, U.S. savings bonds)	No	No
• Federal Government Retirement Accounts (e.g., Thrift Savings Plan)	No	No
• Life insurance and annuities	No	No
• Collectibles	No	No
• Assets held within an excepted trust ³	No	No

Investment Assets	Periodic Transaction Report	Annual and/or Termination Report
	Report on the OGE 278-T?	Report on Schedule B of the OGE 278?
• Transfer of assets between you, your spouse, and your dependent children	No	No

¹ Do not report the purchase or sale of your personal residence on Schedule B unless you rent it out at any time during the reporting period.

² To be an excepted investment fund (EIF), the asset must be:

- (a) widely held (more than 100 participants),
- (b) independently managed – arranged so that you neither exercise control nor have the ability to exercise control over the financial interests held by the fund, and
- (c) publicly traded (or available) or widely diversified.

There are several types of investment vehicles that are not excepted investment funds, including (but not limited to) managed accounts, investment clubs, trusts, 529 accounts, brokerage accounts, and individual retirement accounts (IRAs). You should note that the individual assets held within these types of investment vehicles may qualify as EIFs if, for example, your IRA holds a publicly-traded mutual fund. If you have questions about whether a particular asset or investment vehicle is an EIF, contact ethics@epa.gov.

³ OGC/Ethics must determine that your trust qualifies as an “excepted trust.” For help, email [[HYPERLINK "mailto:ethics@epa.gov"](mailto:ethics@epa.gov)].